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S167 Akatarawa Valley Residents - Allan and Sarah Kelly

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
167.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
167.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
167.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
167.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
167.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
167.006	General comments	General comments - economic	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		cost/impact		been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
167.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
167.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
167.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
167.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
167.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
167.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
167.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S149 Akatarawa Valley Residents - Allan MacDonald

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
149.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
149.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
149.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
149.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
149.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
149.006	General comments	General comments -	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		economic cost/impact		available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
149.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
149.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
149.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares -	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
149.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
149.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
149.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
149.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				costs could be unsustainable for the average property owner.	

S154 Akatarawa Valley Residents - Ash Barker & Kes Barker

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
154.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
154.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
154.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
154.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
154.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
154.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
154.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
154.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
154.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		on a property of between 4 hectares and 20 hectares - permitted activity.		is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	
154.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
154.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
154.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
154.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		on 20 hectares or more of land - permitted activity.		Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S168 Akatarawa Valley Residents - Barry Hearfield & Carol McGhie

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
168.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
168.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
168.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
168.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
168.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
168.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
168.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
168.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
168.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
168.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
168.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
168.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
168.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S159 Akatarawa Valley Residents - Bruce Stevens & Theresa Stevens

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
159.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
159.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
159.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				made available for consultation earlier in the process.	
159.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
159.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
159.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
159.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
159.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm	Reinstate the exclusions as given to the other districts.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				accessways, and that GWRC has not provided justification or evidence for this change.	
159.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
159.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
159.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
159.0012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		between 4 hectares and 20 hectares - permitted activity.			
159.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S143 Akatarawa Valley Residents - Chilly Brook Trust (Mary Redington)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
143.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
143.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a	Stop PC1 process until the policy direction is known.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				waste of ratepayer funds to consult with communities that lacks government policy direction.	
143.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
143.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
143.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
143.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
143.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
143.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
143.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
143.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
143.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
143.012	8 Whaitua Te	Rule WH.R26: Farming	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII,

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	activities on a property of between 4 hectares and 20 hectares - permitted activity.		and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
143.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S166 Akatarawa Valley Residents - Dr Anna De Raadt & Roger Fairclough

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
166.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
166.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
166.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
166.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
166.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
166.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
166.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
166.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
166.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
166.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
166.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield developm	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		ent - prohibited activity.		area, adding to ecosystem health, including that of the waterways.	
166.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
166.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S160 Akatarawa Valley Residents - Dr Harold Cuffe

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
160.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	
160.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
160.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
160.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
160.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
160.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				which regulations have precedence where conflicting.	
160.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
160.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
160.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
160.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
160.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		greenfield development - prohibited activity.		purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	
160.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
160.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S157 Akatarawa Valley Residents - Dr Patricia Laing

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S157.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	
S157.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
S157.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
S157.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
S157.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
S157.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	
S157.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
S157.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
S157.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
S157.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
S157.011	8 Whaitua Te	Rule WH.R13: Stormwate	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	r from new unplanned greenfield development - prohibited activity.		them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	
S157.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
S157.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S158 Akatarawa Valley Residents - Erica Dawson

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
158.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
158.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
158.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
158.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
158.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
158.006	General comments	General comments -	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		economic cost/impact		available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
158.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
158.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
158.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares -	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
158.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
158.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
158.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
158.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				costs could be unsustainable for the average property owner.	

S124 Akatarawa Valley Residents - Fredrick Steensma

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
124.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
124.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
124.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
124.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
124.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
124.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
124.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
124.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
124.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		on a property of between 4 hectares and 20 hectares - permitted activity.		is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	
124.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
124.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
124.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
124.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		on 20 hectares or more of land - permitted activity.		Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S144 Akatarawa Valley Residents - Gaylene Ward & Mike Ward

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
144.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
144.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
144.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
144.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
144.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
144.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
144.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
144.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
144.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
144.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
144.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
144.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
144.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S141 Akatarawa Valley Residents - George Hare

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
141.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
141.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
141.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				made available for consultation earlier in the process.	
141.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
141.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
141.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
141.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
141.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm	Reinstate the exclusions as given to the other districts.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				accessways, and that GWRC has not provided justification or evidence for this change.	
141.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
141.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
141.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
141.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares -	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
141.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S131 Akatarawa Valley Residents - Gillian Taylor & Chris Taylor

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
131.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
131.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
131.003	General comments	General comments -	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		consultation		consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	consultation and engage with affected communities according to the Local Authorities Act.
131.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
131.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
131.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
131.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
131.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and	Reinstate the exclusions as given to the other districts.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	
131.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
131.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
131.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
131.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and 20 hectares - permitted activity.			
131.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S139 Akatarawa Valley Residents - Glenda Arnold

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
139.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
139.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
139.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
139.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
139.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
139.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
139.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
139.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
139.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
139.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
139.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
139.012	8 Whaitua Te	Rule WH.R26: Farming	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII,

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	activities on a property of between 4 hectares and 20 hectares - permitted activity.		and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
139.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S134 Akatarawa Valley Residents - Graeme Allan

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
134.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
134.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
134.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
134.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
134.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
134.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
134.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
134.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
134.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
134.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
134.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield developm	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		ent - prohibited activity.		area, adding to ecosystem health, including that of the waterways.	
134.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
134.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S132 Akatarawa Valley Residents - Hannah Dawson & Ryan Dawson

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
132.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	
132.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
132.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
132.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
132.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
132.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				which regulations have precedence where conflicting.	
132.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
132.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
132.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
132.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
132.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		greenfield development - prohibited activity.		purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	
132.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
132.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S140 Akatarawa Valley Residents - Janet Collins

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
140.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	
140.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
140.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
140.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
140.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
140.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	
140.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
140.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
140.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
140.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
140.011	8 Whaitua Te	Rule WH.R13: Stormwate	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	r from new unplanned greenfield development - prohibited activity.		them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	
140.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
140.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S171 Akatarawa Valley Residents - Jessica Perno & Gavin Perno

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
171.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
171.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
171.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
171.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
171.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
171.006	General comments	General comments -	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		economic cost/impact		available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
171.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
171.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
171.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares -	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
171.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
171.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
171.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
171.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				costs could be unsustainable for the average property owner.	

S128 Akatarawa Valley Residents - Joany Grima & Allen Rockell

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
128.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
128.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
128.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
128.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
128.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
128.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
128.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
128.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
128.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		on a property of between 4 hectares and 20 hectares - permitted activity.		is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	
128.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
128.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
128.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
128.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		on 20 hectares or more of land - permitted activity.		Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S127 Akatarawa Valley Residents - Johanna Overdiep & Steve Sturgess

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
127.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
127.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
127.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
127.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
127.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
127.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
127.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
127.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
127.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
127.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
127.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
127.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
127.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S156 Akatarawa Valley Residents - John Bryce

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
156.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
156.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
156.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				made available for consultation earlier in the process.	
156.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
156.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
156.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
156.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
156.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm	Reinstate the exclusions as given to the other districts.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				accessways, and that GWRC has not provided justification or evidence for this change.	
156.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
156.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
156.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
156.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares -	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
156.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S152 Akatarawa Valley Residents - John Raffan & Heather Raffan

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
152.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
152.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
152.003	General comments	General comments -	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		consultation		consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	consultation and engage with affected communities according to the Local Authorities Act.
152.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
152.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
152.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
152.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
152.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and	Reinstate the exclusions as given to the other districts.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	
152.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
152.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
152.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
152.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and 20 hectares - permitted activity.			
152.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S163 Akatarawa Valley Residents - John Simister

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
163.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
163.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
163.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
163.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
163.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
163.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
163.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
163.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
163.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
163.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
163.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
163.012	8 Whaitua Te	Rule WH.R26: Farming	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII,

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	activities on a property of between 4 hectares and 20 hectares - permitted activity.		and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
163.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S120 Akatarawa Valley Residents - John Van Nortwick & Jill Van Nortwick

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S120.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S120.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
S120.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
S120.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
S120.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
S120.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S120.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
S120.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
S120.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
S120.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
S120.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield developm	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		ent - prohibited activity.		area, adding to ecosystem health, including that of the waterways.	
S120.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
S120.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S147 Akatarawa Valley Residents - Joline Fowke & Owen Fowke

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
147.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	
147.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
147.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
147.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
147.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
147.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				which regulations have precedence where conflicting.	
147.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
147.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
147.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
147.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
147.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		greenfield development - prohibited activity.		purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	
147.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
147.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S137 Akatarawa Valley Residents - Jonathan Wood

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
137.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	
137.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
137.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
137.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
137.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
137.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	
137.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
137.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
137.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
137.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
137.011	8 Whaitua Te	Rule WH.R13: Stormwate	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	r from new unplanned greenfield development - prohibited activity.		them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	
137.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
137.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S135 Akatarawa Valley Residents - Joshua Wood

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
135.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
135.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
135.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
135.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
135.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
135.006	General comments	General comments -	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		economic cost/impact		available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
135.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
135.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
135.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares -	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
135.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
135.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
135.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
135.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				costs could be unsustainable for the average property owner.	

S121 Akatarawa Valley Residents - Karen Wallace & Mark Robbins

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
121.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
121.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
121.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
121.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
121.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
121.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
121.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
121.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
121.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		on a property of between 4 hectares and 20 hectares - permitted activity.		is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	
121.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
121.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
121.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
121.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		on 20 hectares or more of land - permitted activity.		Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S170 Akatarawa Valley Residents - Karina Fraser & Grant Fraser

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
170.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
170.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
170.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
170.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
170.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
170.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
170.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
170.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
170.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
170.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
170.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
170.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
170.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S129 Akatarawa Valley Residents - Keith Budd & Liz Budd

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
129.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
129.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
129.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				made available for consultation earlier in the process.	
129.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
129.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
129.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
129.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
129.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm	Reinstate the exclusions as given to the other districts.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				accessways, and that GWRC has not provided justification or evidence for this change.	
129.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
129.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
129.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
129.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares -	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
129.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S146 Akatarawa Valley Residents - Leanna Jackson & Carl Burns

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
146.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
146.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
146.003	General comments	General comments -	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		consultation		consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	consultation and engage with affected communities according to the Local Authorities Act.
146.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
146.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
146.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
146.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
146.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and	Reinstate the exclusions as given to the other districts.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	
146.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
146.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
146.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
146.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and 20 hectares - permitted activity.			
146.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S133 Akatarawa Valley Residents - Len Drabble

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
133.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
133.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
133.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
133.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
133.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
133.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
133.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
133.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
133.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
133.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
133.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
133.012	8 Whaitua Te	Rule WH.R26: Farming	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII,

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	activities on a property of between 4 hectares and 20 hectares - permitted activity.		and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
133.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S136 Akatarawa Valley Residents - Micayla Wood

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
136.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
136.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
136.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
136.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
136.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
136.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
136.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
136.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
136.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
136.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
136.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield developm	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		ent - prohibited activity.		area, adding to ecosystem health, including that of the waterways.	
136.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
136.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S145 Akatarawa Valley Residents - Nigel Parry & Judy Parry

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
145.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	
145.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
145.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
145.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
145.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
145.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				which regulations have precedence where conflicting.	
145.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
145.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
145.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
145.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
145.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		greenfield development - prohibited activity.		purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	
145.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
145.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S174 Akatarawa Valley Residents - Pam Ritchie

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
174.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	
174.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
174.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
174.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
174.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
174.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	
174.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
174.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
174.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
174.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
174.011	8 Whaitua Te	Rule WH.R13: Stormwate	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	r from new unplanned greenfield development - prohibited activity.		them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	
174.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
174.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S142 Akatarawa Valley Residents - Paul Arnold

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
142.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
142.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
142.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
142.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
142.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
142.006	General comments	General comments -	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		economic cost/impact		available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
142.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
142.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
142.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares -	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
142.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
142.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
142.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
142.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				costs could be unsustainable for the average property owner.	

S148 Akatarawa Valley Residents - Paul Baker

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
148.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
148.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
148.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
148.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
148.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
148.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
148.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
148.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
148.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		on a property of between 4 hectares and 20 hectares - permitted activity.		is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	
148.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
148.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
148.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
148.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		on 20 hectares or more of land - permitted activity.		Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S122 Akatarawa Valley Residents - Paul Lambert & Steph Lambert

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
122.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
122.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
122.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
122.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
122.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
122.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
122.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
122.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
122.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
122.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
122.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
122.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
122.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S130 Akatarawa Valley Residents - Pete Clark

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
130.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
130.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
130.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				made available for consultation earlier in the process.	
130.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
130.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
130.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
130.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
130.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm	Reinstate the exclusions as given to the other districts.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				accessways, and that GWRC has not provided justification or evidence for this change.	
130.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
130.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
130.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
130.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares -	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
130.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S162 Akatarawa Valley Residents - Phil Kirycuk

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
162.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
162.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
162.003	General comments	General comments -	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		consultation		consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	consultation and engage with affected communities according to the Local Authorities Act.
162.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
162.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
162.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
162.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
162.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and	Reinstate the exclusions as given to the other districts.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	
162.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
162.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
162.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
162.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and 20 hectares - permitted activity.			
162.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S150 Akatarawa Valley Residents - Phyllis Strachan

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
150.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
150.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
150.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
150.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
150.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
150.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
150.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
150.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
150.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
150.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
150.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
150.012	8 Whaitua Te	Rule WH.R26: Farming	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII,

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	activities on a property of between 4 hectares and 20 hectares - permitted activity.		and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
150.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S153 Akatarawa Valley Residents - Redington Family Trust (Mary Redington)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
153.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
153.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
153.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
153.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
153.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
153.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
153.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
153.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
153.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
153.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
153.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield developm	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		ent - prohibited activity.		area, adding to ecosystem health, including that of the waterways.	
153.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
153.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S126 Akatarawa Valley Residents - Russell Judd & Cecile Judd

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
126.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	
126.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
126.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
126.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
126.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
126.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				which regulations have precedence where conflicting.	
126.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
126.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
126.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
126.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
126.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		greenfield development - prohibited activity.		purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	
126.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
126.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S123 Akatarawa Valley Residents - Sandy Cooper

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
123.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	
123.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
123.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
123.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
123.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
123.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	
123.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
123.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
123.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
123.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
123.011	8 Whaitua Te	Rule WH.R13: Stormwate	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	r from new unplanned greenfield development - prohibited activity.		them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	
123.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
123.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S164 Akatarawa Valley Residents - Sarah Purdy

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
164.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
164.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
164.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
164.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
164.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
164.006	General comments	General comments -	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		economic cost/impact		available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
164.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
164.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
164.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares -	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
164.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
164.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
164.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
164.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				costs could be unsustainable for the average property owner.	

S125 Akatarawa Valley Residents - Shoshanah (Shosh) Phillips

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
125.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
125.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
125.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.
125.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
125.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
125.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
125.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
125.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.
125.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		on a property of between 4 hectares and 20 hectares - permitted activity.		is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	
125.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
125.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
125.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.
125.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		on 20 hectares or more of land - permitted activity.		Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S155 Akatarawa Valley Residents - Susan Davidson

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
155.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
155.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
155.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
155.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
155.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
155.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
155.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
155.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
155.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
155.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
155.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
155.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
155.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S172 Akatarawa Valley Residents - Thomas Davies

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
172.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
172.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
172.003	General comments	General comments - consultation	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of consultation. Considers meaningful participation was difficult due to the lack of a summary being	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of consultation and engage with affected communities according to the Local Authorities Act.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				made available for consultation earlier in the process.	
172.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
172.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
172.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
172.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
172.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm	Reinstate the exclusions as given to the other districts.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				accessways, and that GWRC has not provided justification or evidence for this change.	
172.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
172.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
172.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
172.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares -	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
172.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S138 Akatarawa Valley Residents - Tony Wood & Helen Wood

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
138.001	General comments	General comments - overall	Oppose	Supports the intention for quality regarding freshwater and ecosystems but seeks an evidence-based approach that supports targeted strategies tailored for particular eco systems and environments. Considers that PC1 fails to provide sufficient evidence or appropriate targeting to rationalise its implementation and would render their land incapable of reasonable use (per section 85 of RMA), especially for those landowners who have yet to build on their property.	Stop the PC1 process immediately and engage with the affected communities using a proper and meaningful consultation process once government direction is clear.
138.002	General comments	General comments - current legislation	Oppose	Notes that the coalition government intends to replace the National Policy Statement for Freshwater Management and repeal the RMA reform and considers that it is unreasonable and a waste of ratepayer funds to consult with communities that lacks government policy direction.	Stop PC1 process until the policy direction is known.
138.003	General comments	General comments -	Oppose	Considers GWRC has failed to meaningfully consult with the community as required by the Local Government Act (2002) and GWRC's principles of	All documents related to this proposal should be communicated in plain language as per the Plain Language Act (2002). Expects GWRC to meet the principles of

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		consultation		consultation. Considers meaningful participation was difficult due to the lack of a summary being made available for consultation earlier in the process.	consultation and engage with affected communities according to the Local Authorities Act.
138.004	General comments	General comments - definitions	Oppose	Considers a definition is needed for "river" and there is a need to define how a 1m water course is measured.	Define important terms to address lack of clear definition and prevent uncertainty and inconsistency. Include picture references to inform what a "river" is.
138.005	General comments	General comments - fresh water	Oppose	Considers that data on river quality throughout the catchment is required to understand the extent of the problem and then determine the causes.	Use relevant scientific evidence of sufficient spatial "resolution" as a basis to inform policy.
138.006	General comments	General comments - economic cost/impact	Oppose	Concerns about cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy. Considers that for landowners who have not yet been in a position to build a home, this plan change is unreasonable and unfair. Concerned that proposed changes by GWRC are out of alignment with regulations soon to be imposed by Upper Hutt City Council. Considers it is difficult to stay on top of regulatory changes and is concerned that PC1 is out of alignment with regulations soon to be imposed by Upper Hutt City Council. Questions which regulations have precedence where conflicting.	All rules that add cost to landowners be reconsidered and "recalibrated" with scientific evidence, whereby the more important issues are tackled instead of a "broad brush approach" to all perceived issues. A reconciliation and analysis of the GWRC proposal and other local authority regulations relevant to rural landowners (e.g. UHCC PC50) is completed to identify instances where regulation is inconsistent.
138.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	~~No decision requested.~~ GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
138.008	2 Interpretation	Earthworks	Oppose	Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and	Reinstate the exclusions as given to the other districts.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	
138.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Considers that landowners should be able to continue to farm at the level practicable for the land rather than be constrained to an arbitrary stocking level. Considers that changing levels of farm activity is normal for rural property farm management, and that the current provisions would see some residents say their land is incapable of reasonable use.	Review stocking rates to allow for low intensity farming. Provide information on how rates have been determined. Include an additional category for small breeds of cattle and deer.
138.010	2 Interpretation	Unplanned greenfield development	Oppose	Considers terminology used in this document describing areas such as the Akatarawa valley as "Unplanned Greenfields Areas" is misrepresentative.	Change the terminology of "Unplanned Greenfield Areas" to "Non-Urban Areas" or "Rural Areas".
138.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns that under PC1, landowners intending to build and live on their properties would need a District Plan change from rural to urban to allow them to do so and associated uncertainty and costs. Considers that urban zone rules are not fit for purpose for rural areas. Considers people who live in rural areas add value to the biodiversity of the area, adding to ecosystem health, including that of the waterways.	Uphold and maintain current landowner property rights and delete all rules that uphold the position taken in this document about this aspect, such as Rule WH. R13.
138.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares	Oppose	Considers there is no data to suggest low intensity hobby farms and lifestyle blocks are the cause of poor water quality and the requirement to register and provide information is onerous and unjustified. Considered registration should be reserved for properties where there is a risk of elevated nitrate levels.	Delete the registration requirement for these properties. GWRC to accept the designation of property management plans set out in the gazette NPS-IB namely QEII, Conservation and other approved property management plans which may include small farms of 4 or more but less than 20 hectares.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and 20 hectares - permitted activity.			
138.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Considers there is no data that points to farming on larger properties being the cause of poor water quality and notes that the RMA currently prohibits clearing of bush to scales that will increase erosion. Considers the requirement to register and provide a farm management plan is onerous and not justified when residents are already incurring costs to maintain the land and/or regenerate indigenous biodiversity, including pest control activities, and costs could be unsustainable for the average property owner.	Consider introducing additional categories of properties that reflect the actual range of properties E.g. add a new category for properties over 20 hectares that are largely unproductive and delete the requirement for this type of property to be registered. Exclude land registered in the Emissions Trading Scheme, QEII Trust, Conservation, approved property plan as per the NPS-IB.

S048 Alan Bell & Associates

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S48.001	General comments	General comments - overall	Not Stated	Supports the Wellington Branch of the New Zealand Farm Forestry Associations submission.	Recommend that GWRC take notice of the information presented in the NZFFAW submission.
S48.002	General comments	General comments - plantation forestry	Not Stated	Concerned proposed planning and paperwork increases in PC1 may lead to forest owners seeking a quick way out by harvesting and not continuing with another rotation and loss of significant areas of productive land. Considers that GWRC should make sure the forest owners do a good job of their roading on all types of land. States the owner gets to utilise their investment in land and infrastructure and water quality due to there being ongoing interest in the land.	Not stated
S48.003	12 Schedules	Schedule 34: Plantation Forestry	Amend	Considers the proposed Plantation Forestry Erosion and Sediment Management Plan, will have detrimental effects on forestry operations and produce negligible water quality improvements.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Erosion and Sediment Management Plan.		Concerned land used for forestry will be rendered unusable due to highest erosion risk land (HERL) mapping as presented in Map 95. Concerned about the lack of compensation and financial assistance for losses of workable land, broader economic impacts, and permanent woody species required to restore and revegetate HERL. Concerned discontinuing forestry rotations may lead to a decline in investment for roads resulting in poor quality roads and environmental outcomes. Concerned requirements to revegetate HERL do not align with ETS obligations which may result in fees around NZU sequestration. 'Questions what in a 'natural state' is and at what point the land was in a 'natural' state. Concerned not all Registered Forestry Advisers will have the expertise to develop plantation Forestry Erosion and Sediment Management Plans that effectively minimises sediment loss.	

S278 Alex Pfeffer

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S278.001	General comments	General comments - overall	Not Stated	Supports maintaining a high level of water quality. Concerned new regulations are blanket rules that are unnecessary in some catchments, would be unfairly applied, and prevent further development of productive use of land.	Not Stated
S278.002	General comments	General comments - target attribute states	Not Stated	Considers restrictive regulations should be applied only when attributes have exceeded acceptable levels and these have been attributed to farming. Considers showing the Mangaroa River as representative of rural streams in Table 8.4 is disingenuous as the river lies in farmland with a	Not Stated.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				high density of lifestyle blocks. Concern that Inorganic Nitrogen regulations are too pre-emptive and inequitable in application. Considers requiring pastoral farms of 4 to 20 Ha with winter stocking units than 12/Ha to undertake nitrogen risk assessments annually should not be imposed unless IN levels are shown to be approaching unacceptable levels over time, but even then additional information is needed. Suggests farms should not be trapped at levels of nitrogen discharge risk arbitrarily at the time of registration. Considers a more equitable method would be to set a maximum allowable nitrogen risk level and alter this up or down as necessary based on acceptable catchment IN levels being challenged. Suggests data is inadequate and needs to be addressed to enable good decision making.	

S035 Amos Mann

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S35.001	General comments	General comments - water bodies	Not Stated	Considers protection of water quality is of upmost importance as it is vital for all life.	Not stated
S35.002	General comments	General comments - water bodies	Not Stated	Supports Plan Change 1 water elements.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S35.003	General comments	General comments - target attribute states	Not Stated	Supports the Target Attribute States for the catchments but suggests they should be even better.	Not stated
S35.004	General comments	General comments - unplanned greenfield development	Not Stated	Supports the inducement to do less on greenfield land and more on brownfield land.	Not stated
S35.005	General comments	General comments - economic cost/impact	Not Stated	Considers costs are important but costs should not be dodged or kicked down the road, and the task is to problem-solve how best we can resource doing water better.	Not stated
S35.006	General comments	General comments - overall	Not Stated	Encourages councils to resource enforcement, science, and policy tools like education, industrial water plans, iwi and community governance, and citizen water-care activity.	Not stated

S244 Andrew Esler

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S244.001	General comments	General comments - overall	Not Stated	"Submitter values the water quality values of the following areas for contact recreation and ecosystem health: i. Te Awakairangi / the Hutt River ii. Whakatikei River iii. Te Whanganui a Tara / Wellington Harbour iv. Porirua Harbour v. Titahi Bay vi. Lyall Bay	Requests the outstanding value of this section [Te Awakairangi / the Hutt Gorge] of river recognised in the plan.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers the natural form and character of these waterbodies is an important part of their value. Natural form and character creates rapids and other features of these sections of river that make them valuable for kayaking. Te Awakairangi / the Hutt Gorge is an outstanding run for whitewater kayaking, which traverses what they consider an outstanding landscape with outstanding amenity values. Would like to see the outstanding value of this section of river recognised in the plan. The natural and wildlife values of these areas are also important to submitter."	
S244.002	General comments	General comments – fresh water	Support	Concerned about amounts of sediment in the Hutt River when flows increase and potential e.coli and pathogen loads in the water. Observes algae in summer months when flows are low resulting in issues with recreation and amenity as well as human health when making contact with water. Concerns that river engineering such as railway iron degrades water quality and creates potential hazards for river users when slash and logs get caught on structures.	Not stated
S244.003	General comments	General comments - overall	Support	Supports PC1 and the initiatives to improve water quality in the catchment.	Requests that GWRC initiatives are carried through to the operative plan, particularly where they protect and restore ecosystem health, contact recreation values, natural form and character, and amenity.
S244.004	General comments	General comments - freshwater	Support	Supports the concept of Te Mana o te Wai and the hierarchy of obligations.	Prioritise ecosystem health and contact recreation prioritised.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S244.005	General comments	General comments - water quality improvements	Support	Key concerns are water quality (particularly e. coli, sediment, algal growth/periphyton, and ecosystem health); amenity; contact recreation; and natural form and character.	Suggests the outstanding kayaking values in the Whaitua recognised in the plan, particularly for the Hutt Gorge (which has outstanding kayaking, amenity, and landscape values). Recognition in the plan of the outstanding kayaking/packrafting/rafting values in the Whaitua, particularly for the Hutt Gorge (which has outstanding kayaking, amenity, and landscape values) More work by GWRC to monitor and preserve natural character and to strengthen objectives, policies, and rules which allow the river to function more naturally, particularly in its reaches influenced by flood protection Targets for natural character that are similar to the targets set for water quality and objectives and policies to support these More work to enhance water quality in the coastal environment, for use of 'flat water' environments to learn and train without compromising health if contact is made with the water Retain coastal water quality indicators/targets.
S244.006	General comments	General comments - target attribute states	Support	Supports targets in the water quality target tables	Requests as much work as possible is done through environmental limits to achieve these targets.

S055 Annette Cairns

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S55.001	General comments	General comments - overall	Not Stated	Supports the submissions of the New Zealand Farm Forestry Association Inc, and the New Zealand Farm Forestry Association's Wellington branch.	Not Stated
S55.002	General comments	General comments - overall	Oppose	Concerns rules governing forestry in PC1 would render interest in land incapable of reasonable use citing section 85 of the RMA	Not Stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S55.003	General comments	General comments - maps	Not Stated	Questions the validity of the mapping techniques used to determine erosion prone land.	Not Stated
S55.004	General comments	General comments - economic cost/impact	Oppose	Believes costs and restrictions of PC1 would make forestry business uneconomic and limit future income	Not Stated

S242 Anya Pollock

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S242.001	General comments	General comments - overall	Support	Supports in full the submission of F.O.W.K.S. (Friends of Waipāhihi Karori Stream)	Not Stated
S242.002	General comments	General comments - water quality improvements	Support	Notes that environmental community values of water bodies have been compromised but are worthy of collective action to improve them. Considers collective action of the regional plan can improve water bodies. Supports Plan Change One and supports the efforts to further environmental education. Supports funding sufficient support and enforcement activities. Considers the proposed Plan Change consolidates planning provisions that are about the environment into one place. Agrees that a consistent approach should be used across the region, both for the environment and to provide greater consistency and certainty for developers. Considers that territorial authorities need to revisit their plans, strategies and investments to comply with the environmental standards and improvement	Supports the direction in Plan Change 1.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				pathways set in the regional plan. Supports regional direction, as ease and efficiency of consenting is best achieved by regional and territorial agencies working together to design and deliver integrated services across all of the planning and consenting requirements. Suggests legacy infrastructure should not be excluded from the need to reduce its impacts.	
S242.003	General comments	General comments - unplanned greenfield development	Support	Considers doing less on greenfield land and more on brownfield land is good, and necessary to meet the objectives. Considers it important that water sensitive urban design becomes the norm, and ongoing maintenance of infrastructure is funded.	Not Stated
S242.004	General comments	General comments - economic cost/impact	Support	Supports Plan Change One regardless of financial cost Notes that GWRC can seek new sources of funding with the right leadership.	Not Stated
S242.005	6 Other methods	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Support	Concerns surrounding rule 5.4.8 that makes dams that are 10 years+ a permitted activity should original permission have been adhered to despite fish passage having not been addressed in earlier consenting.	Provide discretion to Council to require fish passage be provided in such cases, where this would be practical and is required to enable access for fish around an artificial fish passage barrier.

S248 Ara Poutama Aotearoa the Department of Corrections

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S248.001	General comments	General comments - overall	Support	Supports note under the Chapter 8 heading 'Whaitua Te Whanganui-a-Tara Section 8.2: Policies', as it provides for a range of existing operative policies to continue to apply within the whaitua, including those that recognise the beneficial use and development of regionally significant infrastructure.	Retain as notified
S248.002	General comments	General comments - unplanned greenfield development	Oppose	Considers approach taken by PC1 to "unplanned greenfield development" is potentially inappropriate due to the definition of "unplanned greenfield development" being broad and uncertain, particularly as it is unclear whether all development is prohibited by the approach, or only specific kinds of urban development. Notes approach could prohibit works associated with maintenance, upgrading and development of Rimutaka and Arohata prisons in areas identified as "unplanned greenfield development areas", where such works are considered "greenfield development". Notes PC1 does not define what "greenfield development" is. Submitter also raises concerns about practicality and efficiency of this approach noting it creates significant jurisdictional overlap between territorial authorities, the regional council, and the Minister of Conservation (because the provisions are coastal provisions) on the management of development in "unplanned greenfield development areas". Notes this raises procedural concerns about concurrent process that must be used to manage development in "unplanned greenfield development" areas. Decisions on separate plan changes must be made separately by the territorial authority and regional council, and in this case, any change to the	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				unplanned greenfield development area maps must also be approved by the Minister of Conservation. Notes territorial authorities and the regional council have a duty to avoid unreasonable delay which, when applied to separate plan change process, may result in concurrent plan changes becoming unsynchronised. Such an ad-hoc process is likely to be highly inefficient for those seeking changes to regional and district plans and frustrating for those submitting on them, and the risk of inconsistent decision making in relation to the same resource management issue is high. Considers if it is Council's position this issue requires a combined regulatory approach with territorial authorities, then the appropriate means of providing for this is through a combined planning document to address the issue (and the Council is obliged to consider this under section 80(7) of the RMA). Notes this is what the RMA anticipates in this circumstance, but it is not what PC1 provides for.	
S248.003	General comments	General comments - earthworks	Oppose	Considers the proposed earthworks policies and rules do not provide for a reasonable level of earthworks activities. Under the earthworks rules proposed by PC1, earthworks on any scale are no longer a permitted activity (unless they are to implement actions in a farm erosion risk treatment plan or farm environmental plan). As a result, all earthworks are a restricted discretionary activity regardless of scale and are a non-complying activity if those earthworks (again regardless of scale) occur between 1 June and 1 October. Although submitter understands the above notified rule framework is an error, submitters comments are made on the plan change as notified given the legal effect of the provisions. Considers it inefficient to require resource consent for almost all earthworks regardless of scale and	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				has concerns this will create a significant administrative burden for applicants and Council with little clear environmental benefit. Considers adverse environmental effects associated with small scale earthworks can be appropriately addressed through permitted activity conditions in the NRP and District Plans. Considers restricting all earthworks activities between 1 June and 1 October is overly restrictive and submitter recognises earthworks should be planned so that the majority of bulk earthworks occur outside of the winter months. Notes there may be instances where earthworks are unavoidable at this time, and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Notes that the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), which is referred to in the earthworks provisions as the guiding document for earthworks practice, provides a pathway for earthworks to be undertaken during the winter months subject to careful management (refer specifically to section G5.0 of the guideline), and considers that pathway should continue to be available to applicants through the consent process. Considers that non-complying activity status for earthworks that do not meet restricted discretionary conditions does not sufficiently facilitate the maintenance, upgrade, or development of its sites which leads to a high degree of uncertainty as to whether consents for maintenance, development, or upgrades to corrections sites will be granted under section 104D of the RMA, even where adverse effects of the part of the proposal that triggered non-complying activity status can be appropriately managed through consent conditions. Considers a reasonable level of earthworks,	

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				including potentially necessary earthworks during the winter months, should be enabled subject to appropriate conditions to manage potential adverse effects.	
S248.004	General comments	General comments - maps	Not Stated	Questions the appropriateness of the mapping used to identify where resource consent is required for vegetation clearance, plantation forestry, or earthworks on erosion-prone pasture. Notes the mapping for these features includes numerous small and incohesive areas and submitter questions the efficiency or effectiveness of regulating numerous small (which in many cases measure no greater than 5m by 5m) incohesive areas to manage land stability. Considers maps should be amended to only identify cohesive areas being subject to the rules. In relation to policies, rules, and schedules in relation to plantation forestry, submitter suggests these could be refined to enable plantation forestry operations to continue, particularly where it provides benefits for minimising soil erosion and carbon sequestration. Considers much of Schedule 34 duplicates statutory requirements contained in other documents (particularly the NES-CF) and considers Schedule 34 should be part of a Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.	Not stated
S248.005	General comments	General comments - stormwater management	Amend	Considers the mandatory requirement to take financial contributions provided for by PC1 are not consistent with the effects management hierarchy set out under the NPS-FM. PC1 promotes mandatory financial contributions as a method of offsetting residual adverse effects of contaminants from impervious surface runoff. Approach taken by PC1 is to require financial contributions to offset all residual adverse effects regardless of scale.	Seeks the mandatory requirement for financial contributions as a condition of the rules is removed, but that the financial contributions regime proposed by PC1 continues to be provided for through PC1's policies, as an optional method alongside other offsetting or compensation methods provided for by NPS-FM.

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				Submitter considers this is inconsistent with the effects management hierarchy in the NPS-FM, which requires only residual adverse effects that are more than minor be offset (or compensated). Considers applicants should be given reasonable opportunity to avoid, minimise, or remedy adverse effects associated with contaminants in stormwater runoff, to the extent that residual adverse effects are minor or less than minor. Considers only in circumstances where residual adverse effects are more than minor should offsetting (or compensation) be required. Further, in circumstances where offsetting or compensation is required, applicants should not be bound to financial contributions, and should have an option to propose offsetting or compensation in line with Appendix 6 and Appendix 7 of the NPS-FM. Submitter recognises the financial contributions method proposed by PC1 could be an effective method of offsetting and should remain open as an option in circumstances where offsetting is required. Notes however, financial contributions will only be effective where they are used to deliver appropriate offsetting projects. Considers projects must be planned for and delivered through the Council's Long-term Plan and Infrastructure Strategy for this to occur.	
S248.006	General comments	General comments - fresh water	Amend	Notes inappropriate use of the freshwater planning process for vegetation clearance and earthworks provisions. Provisions for vegetation clearance and the permitted activity rule for earthworks, have been included in this freshwater planning instrument. Considers this is an inappropriate use of the freshwater planning instrument as principal purpose of these provisions is to control the use of land for	Seeks provisions be reallocated to the Part 1 Schedule 1 planning instrument.

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				the purpose of soil conservation. Also considers none of these rules manage discharges to freshwater.	
S248.007	General comments	General comments - definitions	Not Stated	Provide definitions for "raingarden" and "bioretention device".	Include definitions for terms including "raingarden" and "bioretention device".
S248.008	General comments	General comments - overall	Not Stated	Amendments to long-term vision objectives for both whaitua, to recognise that restoration of natural character may not be possible in relation to regionally significant infrastructure.	Amend long-term vision objectives for both Whaitua to recognise that restoration of natural character may not be possible in relation to regionally significant infrastructure.
S248.009	General comments	General comments - earthworks	Not Stated	Amendments to general policy for management of earthworks to improve practicality of policy.	Amend earthworks policy to improve practicality
S248.010	General comments	General comments - overall	Not Stated	Amendments to all provisions related to high-risk industrial and trade premises to ensure focus of provisions is on the management of hazardous substances, not on contaminants generally.	Amendments to all provisions related to high-risk industrial and trade premises to ensure that focus of provisions is on the management of hazardous substances, not on contaminants generally (which are already provided for under other provisions).
S248.011	General comments	General comments - plantation forestry	Not Stated	Amendments to permitted activity rule for vegetation clearance on highest erosion risk land (woody vegetation) to ensure vegetation clearance less than 200m2 is clearly provided for under rule (and is not an innominate discretionary activity).	Amendments to the permitted activity rule for vegetation clearance on highest erosion risk land (woody vegetation) to ensure that vegetation clearance less than 200m2 is clearly provided for under the rule (and is not an innominate discretionary activity).
S248.012	General comments	General comments - earthworks	Not Stated	Amendment to restricted discretionary activity rule for earthworks, to recognise discharges of sediment are not included under permitted activity rule for earthworks (and are instead covered by the NRP's minor discharge rule R91).	Amendment to the restricted discretionary activity rule for earthworks, to recognise discharges of sediment are not included under the permitted activity rule for earthworks (and are instead covered by the NRP's minor discharge rule R91).
S248.013	2 Interpretation	High risk industrial or trade premise	Amend	Supports appropriate control through NRP over high-risk industrial or trade premises but notes provisions proposed by PC1 for high risk industrial or trade premises are unreasonable with respect to control of impervious surfaces, which provide for	Considers amendments are necessary to the rules that relate to new or redeveloped impervious surfaces to provide for a reasonable level of impervious surface development or redevelopment at high-risk industrial or trade premises as a

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				redevelopment of existing or the creation of new impervious surfaces at high-risk industrial or trade premises as a discretionary activity. Considers approach does not enable a reasonable level of maintenance, upgrading, or development (subject to appropriate conditions) and rules incentivise retaining existing degraded impervious surfaces, and do not recognise new or redeveloped impervious surfaces will perform better at containing hazardous substances and other contaminants than existing ones. Considers this counter-productive and contrary to objectives of the NRP, which seek to maintain or improve water quality.	permitted or controlled activity, subject to appropriate conditions.
S248.014	2 Interpretation	Highest erosion risk land (pasture)	Neutral	Notes their submission on the provisions and maps that relate to this definition.	Retain as notified (noting the submission points on the maps and provision).
S248.015	2 Interpretation	Highest erosion risk land (woody vegetation)	Neutral	Notes their submission on the provisions and maps that relate to this definition.	Retain as notified (noting the submission points on the maps and provision).
S248.016	2 Interpretation	Impervious surfaces	Neutral	Notes their submission on the provisions and maps that relate to this definition.	Retain as notified (noting the submission points on the provisions).
S248.017	2 Interpretation	Redevelopment	Amend	Seeks reference to redevelopment of existing urbanised property is removed, as the definition also applies to rules that are not exclusively limited to redevelopment of urbanised property - refers to WH.R11 for example. Secondly, reference to "minor" under the first bullet point should be removed as the term 'minor' is subjective and adds uncertainty to scope of definition.	Amend as follows: ~~For the purpose of assessment of a proposal involving the redevelopment of an existing urbanised property (i.e brownfield development, upgrades to existing roads etc.)~~ in relation to stormwater effects, this includes is the replacement, reconstruction or addition (new) of impervious surfaces. Excludes: -~~minor~~ maintenance or repairs to roads, carparking areas, driveways, and paving -installation, maintenance or repair of underground infrastructure or network utilities requiring trenching and

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					resurfacing -activities that only involve the re-roofing of existing buildings.
S248.018	2 Interpretation	Unplanned greenfield development	Oppose	Notes term "greenfield development" is undefined resulting in a high degree of uncertainty about types of development that are prohibited under the rules. Considers this level of uncertainty is inappropriate for a definition that determines the scope of prohibited activity rules. Considers if the term "greenfield development" is interpreted as development on greenfield land (as defined on the planning maps) then this would include all types of development, which covers all existing developed area at Arohata Prison and part of Rimutaka Prison. But notes if the intent of the definition and associated provisions is to manage urban development on land not previously developed, then this should be clearly stated. Considers that the term "greenfield development" must be defined and suggests the that this is similar to the definition of "greenfield" used in the Auckland Unitary Plan. Considers to support this definition, the term "urban development" should also be defined in the Plan and the "urban development" definition from the Regional Policy Statement would be appropriate and support integration between the RPS and the NRP. Considers this package of amendments to the definitions will provide sufficient certainty about the scope of the term "greenfield development", provide for integration with RPS, and ensure development of prison sites is not prohibited in "unplanned greenfield development" areas.	Amend the definition of "unplanned greenfield development" as follows: **Greenfield development** within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 which also require an underlying zone change (from rural/non- urban/open space to urban) though a District Plan change to enable the development. Note: Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023. Provide a definition of "greenfield development" as follows: **Greenfield development** **Urban development on land that has not been previously developed for urban land uses.** As a consequential amendment, add a definition for "urban development" in the NRP to match the Regional Policy Statement definition as follows: **Urban development** **Urban development is subdivision, use and development that is characterised by its planned reliance on reticulated services (such as water supply and drainage) by its generation of traffic, and would include activities (such as manufacturing), which are usually provided for in urban areas. It also typically has lots sizes of less than 3000 square metres.**
S248.019	5.2 and 5.3	Rule R101:	Oppose	Seeks the operative permitted activity rule for earthworks continues to apply within Whaitua Te	Retain rule R101 so that it continues to apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.

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	Discharges to land and water and land use rules	Earthworks - permitted activity.		Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua, as rules WH.R23 and P.R22 do not provide any permitted activity threshold for earthworks smaller than 3,000m2 per property, and the operative rule provides reasonable conditions for undertaking all other earthworks that are less than 3,000m2 that are not otherwise permitted by WH.R23 and P.R22.	
S248.020	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	Considers policy is inappropriate because definition of "unplanned greenfield development" is broad, uncertain, and could prohibit maintenance, upgrading and development of regionally significant infrastructure. Considers prohibition on unplanned greenfield development is inappropriate and must be removed. If relief sought by submitter on the definition of "unplanned greenfield development" is granted in full, submitter would adopt a neutral position on this aspect of policy. Considers amendment to policy is necessary to ensure it is consistent with effects management hierarchy set out in NPS-FM. Aquatic offsetting is only necessary where residual adverse effects are more than minor, and resource consent applicants should be encouraged to minimise residual adverse effects so they are no more than minor (in which case aquatic offsetting is not required). Considers if aquatic offsetting is required, financial contributions as proposed by PC1 should be available as a discretionary option for achieving offsetting, but not a mandatory requirement. If applicants can provide alternative effective methods of aquatic offsetting as part of proposal in accordance with Appendix 6 of NPS-FM, then financial contributions should not be required.	Amend as follows: Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (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 (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and

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					(g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.
S248.021	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Amend	Considers it impracticable to avoid contaminants being entrained in stormwater and notes this is acknowledged in section 32 report and by policies such as WH.P15. Focus of the policy is on management of hazardous substances prepared, used or stored at high risk industrial and trade premises, so reference to contaminants generally should be removed from the policy, in order that the policy is implementable and retains clear focus on the management of hazardous substances. Notes management of stormwater contaminants generally is provided for under policies WH.P10 and WH.P14, which will also apply to high risk industrial or trade premises.	Amend policy as follows: Policy WH.P11: Discharges of ~~contaminants~~ **hazardous substances** in stormwater from high risk industrial or trade premises The discharge of stormwater to water, including discharges via the stormwater network, from a high risk industrial or trade premise shall be managed by: (a) having procedures and equipment in place to contain any spillage of hazardous substances for storage or removal, and (b) avoiding ~~contaminants or~~ hazardous substances being entrained in stormwater and discharged to a surface water body or coastal water, including via the stormwater network, or where avoidance is not practicable, implementing good management practice to avoid or minimise adverse effects on the environment, including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and (c) installing an interceptor where there is a risk of petroleum hydrocarbons entering into the stormwater network, a surface water body or coastal water, and (d) avoiding or mitigating adverse effects of stormwater discharges on groundwater quality.
S248.022	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new	Amend	Notes raingardens and bioretention devices referred to in Clause (a)(ii) are not defined terms in the plan and both terms need to be added to Plan to provide certainty for users.	Amend definitions section to include a definition of "raingarden" and "bioretention device".

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		and redeveloped impervious surfaces.			
S248.023	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Amend	Considers policy be amended so that its consistent with effects management hierarchy set out in NPS-FM, which requires aquatic offsetting or compensation is provided in circumstances where residual adverse effects are more than minor. Considers financial contributions should not be a mandatory means of providing aquatic offsetting, and resource consent applicants should have reasonable opportunity to provide aquatic offsetting or compensation in accordance with Appendix 6 or 7 of NPS-FM as part of proposals.	Amend as follows: Policy WH.P15: Stormwater contaminant offsetting **or compensation** for new greenfield development ~~The~~ **More than minor** adverse effects of residual (post-treatment) stormwater contaminants from new greenfield development, roads (not already captured as part of a greenfield development) and state highways where the discharge will enter a surface water body or coastal water, including via an existing or new stormwater network, are to be offset by way of:**(a) aquatic offsetting or compensation in accordance with Appendix 6 or 7 of the National Policy Statement on Freshwater Management 2020; or (b)** a financial contribution in accordance with Schedule 30 (financial contribution).
S248.024	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Oppose	Considers the definition of unplanned greenfield development is too broad and uncertain. Unclear if all development is prohibited or just specific kinds of urban development. Concerns the approach could prohibit works on prison assets or areas that are already effectively developed but are located within areas identified as "unplanned greenfield development areas", where such works are considered to be "greenfield development. Questions the efficiency and practicability of the proposed approach which creates jurisdictional overlap between territorial authorities, the regional council, and the Minister of Conservation on the management of development in "unplanned greenfield development areas". Noting decisions on separate plan changes must be made separately and considers this will be highly inefficient for	Delete policy

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				applicants and submitters and applicants and risks inconsistency. Considers the appropriate means of providing for a combined regulatory approach is through a combined planning document to address the issue, as per section 80 of the RMA. If the relief sought by submitter on definition of "unplanned greenfield development" is granted in full, submitter would consider adopting a neutral position on rule.	
S248.025	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Amend	Questions feasibility of point (c) of this policy with regard to disparate areas of high erosion risk plantation forestry land identified in Map 92. Notes under this policy, it appears harvesting plantation forestry and replanting in pine is to be avoided. Noting the incentives for replanting provided in section B3 of Schedule 27 (relating to undertaking programmes to actively support revegetation of and sediment management on highest erosion risk land (plantation forestry)), the practicality of replanting in natives can be challenging, and may result in forestry owners not replanting the land at all. Considers replanting with pine still provides benefits for stabilising erosion-prone land and considers this policy could be counterproductive. Considers this point would appear to be contrary to the Emissions Trading Scheme, which requires forests are registered to the scheme are replanted after harvesting, as they provide important carbon sequestration benefits. Submitter seeks that point (c) of this policy be deleted and notes this policy would be subject to consequential amendments resulting from the relief it is seeking on Schedule 34.	Amend policy as follows: Policy WH.P28 Achieving reductions in sediment discharges from plantation forestry Reduce discharges of sediment from plantation forestry by: (a) identifying highest erosion risk land (plantation forestry), and (b) improving management of plantation forestry by requiring erosion and sediment management plans to be prepared and complied with., ~~and~~ ~~(c) requiring that on highest erosion risk land (plantation forestry), plantation forestry is not established or continued beyond the harvest of existing plantation forest.~~

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S248.026	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Amend	Considers the word "risk" should be replaced with "adverse effects", as resource management policies should seek to manage actual or potential adverse effects of an activity, rather than risks generally. Notes the requirement to retain soil and sediment on site under clause (a) does not recognise that soil and sediment may need to be removed from site in a controlled manner (for example, to a cleanfill area) as part of the works associated with the maintenance, upgrading, or development of existing developed sites. To recognise this, submitter considers that clause (a) should be amended to seek the uncontrolled loss of soil and sediment from site is minimised, rather than requiring all soil and sediment to be retained on site. Considers clause (b) should be qualified with "where practicable" to recognise that any limits placed on land disturbance should be reasonable and proportionate, particularly in the context of the good management practices already required by clause (a)	Amend as follows: Policy WH.P29: Management of earthworks The ~~risk~~ **adverse effects** of sediment discharges from earthworks shall be managed by: (a) ~~requiring retention~~ **minimising the uncontrolled loss** of soil and sediment on the land using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), for the duration of the land disturbance, and (b) limiting, **where practicable,** the amount of land disturbed at any time, and (c) designing and implementing earthworks with knowledge of the existing environmental site constraints, specific engineering requirements and implementation of controls to limit the discharge of sediment to receiving environments, and (d) requiring erosion and sediment control measures to be installed prior to, and during earthworks and ensuring those controls remain in place and are maintained until the land is stabilised against erosion
S248.027	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Support	Considers standards set out in policy to be reasonable.	Retain as notified
S248.028	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of	Oppose	Considers a policy requiring all earthworks over 3,000m2 to be shut down over the winter months is inappropriate, as it does not recognise there may be circumstances where earthworks need to occur over those months in order to provide for safe and efficient operation, maintenance, upgrading, or	Delete policy

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		earthworks.		development of prison infrastructure. Considers there are instances where earthworks are unavoidable at this time, and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Notes GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), which is referred to in the policy, provides a pathway for earthworks to be undertaken during the winter months subject to careful management and considers pathway should continue to be available to applicants through consent process.	
S248.029	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Amend	Considers permitted activity conditions to be reasonable, with exception of the point (e) which implies the bore is shallow and is abstracting water from an unconfined aquifer. Notes if this is the case, it should be clarified in the standard. Considers note at the end of the rule should be amended to improve clarity. Also considers reference to "redeveloped premises" be removed, as it is addressed through separate rule cascade related to new or redeveloped impervious surfaces (rules R5 to R7).	Amend as follows: Rule WH.R2: Stormwater to land - permitted activity The discharge of stormwater onto or into land, including where contaminants may enter groundwater: (a) that is not from a high risk industrial or trade premise, or (b) that does not discharge from, or to, a local authority stormwater network, is a permitted activity provided the following conditions are met: (c) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (d) the discharge shall not cause or exacerbate the flooding of any other property, and (e) the discharge is not located within 20m of a **shallow** bore **(<20m depth), extracting from an unconfined aquifer,** used for water abstraction for potable supply or stock water. Note In respect of a discharge **of stormwater** from an existing high risk industrial or trade premise refer to Rule WH.R4, and for discharges **of stormwater** from new ~~or redeveloped~~

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					~~premises~~ **high risk industrial or trade premises** refer to Rule WH.R11. For existing discharges from or into a local authority stormwater network refer to Rule WH.R9.
S248.030	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Amend	Considers permitted activity conditions reasonable but seeks the note at the bottom of the rule be amended to improve its clarity.	Amend as follows: Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity The discharge of stormwater from an existing individual property into water, or onto or into land where it may enter a surface water body or coastal water, (a) that is not from a high risk industrial or trade premise, or (b) that is not from a port, airport or state highway, or (c) that does not discharge from, or to, a local authority stormwater network, is a permitted activity, provided the following conditions are met: (d) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (e) the discharge does not contain wastewater, and (f) the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and (g) the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (h) the discharge shall not give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii)

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					any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life. Note In respect of the discharge **of stormwater** from an existing high risk industrial or trade premise refer to Rule WH.R4. Discharges from a port or airport refer to Rule WH.R8. For discharges from an existing individual property into the stormwater network refer to Rule WH.R9.
S248.031	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Amend	Considers limiting the application of this rule to existing high risk industrial or trade premises may result in new activities involving the likes of chemical storage or engineering-related activities being a discretionary activity under rule WH.R11. Subject to amendment to condition (d), considers conditions are appropriate to manage potential adverse effects associated with stormwater discharges from existing or new high risk industrial or trade premises, as both should be provided for under the same rule. Considers condition (d) of rule should be amended to remove reference to contaminants and retain a focus on hazardous substances. Considers the term "contaminants" is too broad and given purpose of managing high risk industrial or trade premises is to manage potential adverse effects associated with discharge hazardous substances, it is appropriate condition (d) manages only hazardous substances, rather than contaminants more broadly (which are managed under the remainder of the conditions).	Amend as follows: Rule WH.R4: Stormwater from ~~an existing~~ high risk industrial or trade premise - permitted activity The discharge of stormwater from ~~an existing~~ high risk industrial or trade premise, that is not a port or airport, into water, or onto or into land where it may enter water, including via an existing local authority stormwater network, is a permitted activity, provided the following conditions are met: (a) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (b) the discharge does not contain wastewater, and (c) if the discharge is to land where it may enter groundwater, (i) the discharge cannot cause or exacerbate the flooding of any other property, and (ii) the discharge is not located within 20m of a bore used for

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				Considers note at the end of rule be deleted as part of giving effect to relief sought in this submission, as well as relief sought by submitter in relation to rules for new or redeveloped impervious surfaces.	water abstraction for potable supply or stock water, and (d) any ~~contaminants stored or used on site, or~~ hazardous substances **stored or used on site,** cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or (i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or (ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons, and (e) if the discharge is into a surface water body, coastal water or via an existing local authority stormwater network, the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and where the discharge is not via an existing local authority stormwater network the discharge shall also not: (f) cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (g) give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm

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					animals, or (vi) any significant adverse effects on aquatic life. ~~Note~~ ~~For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to WH.R11.~~
S248.032	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Notes some activities at prison and community corrections sites in the region are likely to be considered as "high risk industrial or trade premises" under the proposed definition (e.g. chemical / fuel storage and/or engineering-related activities). Notes proposed rules make new or redeveloped impervious surfaces at high risk industrial or trade premises a discretionary activity under rule WH.R11. Concerns this could lead to perverse environmental outcomes, where impervious surfaces are left to degrade because redevelopment of the surface would require a discretionary activity consent and notes degraded impervious surfaces will be less effective at containing contaminants (including the accidental spillage of hazardous substances) than redeveloped impervious surfaces. Considers it necessary to provide for new and redeveloped impervious surfaces as permitted or controlled activity under rules WH.R5, WH.R6 and WH.R7, subject to appropriate conditions. Considers additional conditions under (d) of rule WH.R4 are appropriate to manage potential adverse effects associated with hazardous substances and considers these be incorporated into rule WH.R5. Considers Condition (c)(ii) should be amended so hydrological control is only required for new impervious surfaces, as redevelopment of existing	Amend as follows: Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or new local authority stormwater network, that is not ~~a high risk industrial or trade premise or~~ unplanned greenfield development, is a permitted activity, provided the following conditions are met: (a) the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m2 (baseline property existing impervious area as at 30 October 2023) and (b) all new building materials associated with the development shall not include exposed zinc (including galvanised steel) or copper roof, cladding and spouting materials, and (c) the proposal provides hydrological control measures (for example rain tanks) onsite or offsite, where discharges will enter a surface water body (including via an existing local authority stormwater network): (i) for all ~~impervious areas~~ **impervious surfaces** associated with a greenfield development, or (ii) for all ~~redeveloped and~~ new ~~impervious areas~~

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				impervious surfaces will not change quantity of runoff from impervious surfaces. Seeks references to "impervious areas" (undefined) in conditions (c)(i) and (ii) be replaced with "impervious surfaces" (defined) and minor amendments made to condition (c)(ii) to improve the clarity of condition.	**impervious surfaces** ~~involving~~ greater than 30m2 ~~of impervious area of a~~ **associated with** redevelopment (of an existing urbanised property), and (d) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (e) the discharge does not contain wastewater, and (f) the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and where the discharge is not via an existing or new local authority stormwater network: (g) the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (h) the discharge shall not give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life.,**and where the new or redeveloped impervious surface is for a high risk industrial or trade premise:** **(i) any hazardous substances stored or used on site cannot be entrained in stormwater and enter a surface water body or coastal water, including via the**

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					stormwater network, or **(i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or** **(ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons.** Note Where a property connects to a local authority stormwater network, additional connection requirements and authorisations may be required by the network utility operator.~~For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to WH.R11.~~
S248.033	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Notes some activities at prison and community corrections sites in the region are likely to be considered as "high risk industrial or trade premises" under the proposed definition (e.g. chemical / fuel storage and/or engineering-related activities). Notes proposed rules make new or redeveloped impervious surfaces at high risk industrial or trade premises a discretionary activity under rule WH.R11. Concerns this could lead to perverse environmental outcomes, where impervious surfaces are left to degrade because redevelopment of the surface would require a discretionary activity consent and notes degraded impervious surfaces will be less effective at containing contaminants (including the accidental spillage of hazardous substances) than redeveloped impervious surfaces. In order to provide for a reasonable level of maintenance, upgrading and development of	Amend rule as follows: Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity The use of land for the creation of new impervious surfaces for greenfield development and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not ~~a high risk industrial or trade premise or~~ unplanned greenfield development, is a controlled activity, provided the following conditions are met: (a) the proposal involves the creation of new impervious surfaces of between 1,000m2 and 3,000m2 (baseline property existing impervious area as at 30 October 2023) or, (b) the proposal involves the creation new impervious surfaces of less than 1,000m2, but is not permitted under the conditions of Rule WH.R5,

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				impervious surfaces, submitter considers it necessary to provide for new and redeveloped impervious surfaces as permitted or controlled activity under rules WH.R5, WH.R6 and WH.R7, subject to appropriate conditions. Considers additional conditions under (d) of rule WH.R4 are appropriate to manage potential adverse effects associated with hazardous substances and considers these be incorporated into rule WH.R6. As per submission on policy WH.P15, submitter considers it not consistent with the NPS-FM to require mandatory financial contributions for purposes of aquatic offsetting, as the effects management hierarchy in NPS-FM only requires offsetting in circumstances where residual adverse effects are more than minor. Where residual adverse effects are more than minor, applicants should have opportunity to propose aquatic offsetting or compensation in accordance with Appendix 6 or 7 of NPS-FM. Considers it is inappropriate to require financial contributions as a condition, and instead, matter of control 6 should be amended to refer to policy WH.P15. This ensures appropriate aquatic offsetting or compensation (which may include financial contributions under Schedule 30) can be considered on a case by case basis, where required.	and,~~(c) a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions),~~ ~~and~~ (d) where stormwater directly or indirectly (through an existing local authority stormwater network) discharges to a river, hydrological control is provided either: (i) on-site, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has been sized to accommodate the proposed stormwater discharges, and (e) stormwater contaminant treatment is provided that captures 85% of the mean annual runoff and directs it to a stormwater treatment system that treats in accordance with Schedule 28 (contaminant treatment) and is provided either: (i) on-site, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater treatment system that has capacity to treat contaminant loads from the site.,**and where the new impervious surface is for a high risk industrial or trade premise:** **(f) any hazardous substances stored or used on site cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or** **(i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or** **(ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons.** Matters of control 1. The design and layout of the on-site stormwater treatment system, including the ongoing operational and management measures necessary to ensure that stormwater quality will

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					meet the requirements of condition (e) of this rule 2. The adequacy of hydrological control measures either on-site or off- site, where stormwater will enter a river 3. Where an off-site (or a combination of on-site and off-site) stormwater treatment system is utilised, whether this has capacity, availability (timing) and appropriate authorisations to connect into 4. The long-term operational, maintenance and ownership requirements of the stormwater treatment system 5. Whether sufficient use of water sensitive urban design measures have been applied to the site design and layout~~6. A financial contribution as required by Schedule 30 (financial contributions)~~ **Any aquatic offsetting or compensation proposed in accordance with policy WH.P15** **7. For high risk industrial or trade premises, the adequacy of any proposed containment system, interceptor system, or other proposed methods for the management of hazardous substances** 8. Condition of consent to demonstrate and/or monitor compliance with conditions (d),~~and~~ (e), **and (f)** of this rule Notification In respect of Rule WH.R6, applications are precluded from limited and public notification (unless special circumstances exist). ~~Note~~ ~~For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to WH.R11.~~
S248.034	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces	Amend	Notes some activities at prison and community corrections sites in the region are likely to be considered as "high risk industrial or trade premises" under the proposed definition (e.g. chemical / fuel storage and/or engineering-related activities). Notes proposed rules make new or redeveloped impervious surfaces at high risk industrial or trade premises a discretionary activity under rule WH.R11. Concerns this could lead to	Amend rule as follows: Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity The use of land for the creation of new and/or redevelopment of impervious surfaces of an existing urbanised property and the associated discharge of

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		of existing urbanised areas - controlled activity.		perverse environmental outcomes, where impervious surfaces are left to degrade because redevelopment of the surface would require a discretionary activity consent and notes degraded impervious surfaces will be less effective at containing contaminants (including the accidental spillage of hazardous substances) than redeveloped impervious surfaces. In order to provide for a reasonable level of maintenance, upgrading and development of impervious surfaces, submitter considers it necessary to provide for new and redeveloped impervious surfaces as permitted or controlled activity under rules WH.R5, WH.R6 and WH.R7, subject to appropriate conditions. Considers additional conditions under (d) of rule WH.R4 are appropriate to manage potential adverse effects associated with hazardous substances and considers these be incorporated into rule WH.R7.	stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, ~~that is not a high risk industrial or trade premise,~~ is a controlled activity, provided the following conditions are met: (a) the proposal involves the creation of new, or redevelopment of impervious surfaces of between 1,000m2 and 3,000m2 (baseline property existing impervious area as at 30 October 2023) or, (b) the proposal involves the creation of new, or redevelopment of impervious areas of less than 1,000m2 but is not permitted under the conditions of Rule WH.R5, and, (c) where stormwater directly or indirectly (through an existing local authority stormwater network) discharges to a river, hydrological control is provided either: (i) on-site, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has been sized to accommodate the proposed stormwater discharges, and (d) contaminant treatment of stormwater is provided either: (i) on-site through a stormwater treatment system, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater treatment system that has capacity to treat contaminant loads from the site**and where the new or redeveloped impervious surface is for a high risk industrial or trade premise:** **(e) any hazardous substances stored or used on site cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or** **(i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or** **(ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the**

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					treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons. Matters of control 1. Whether the design and layout of the on-site stormwater treatment system incorporates best practicable option measures to achieve (to the extent practicable) the capture of 85% of the mean annual stormwater runoff and treatment in accordance with Schedule 28 (contaminant treatment) 2. Whether the design and layout undertakes a best practicable option approach to the provision of hydrological control measures either onsite or offsite, where stormwater will enter a river 3. Where an off-site (or a combination of on-site and off-site) stormwater treatment system is utilised, whether this has capacity, availability (timing) and appropriate authorisations to connect into 4. The long-term operational, maintenance and ownership requirements of the stormwater treatment system 5. Whether there are topographical limitations influencing the provision of stormwater hydrological control and contaminant treatment 6. Whether sufficient use of water sensitive urban design methods have been applied to the site design and layout**7. For high risk industrial or trade premises, the adequacy of any proposed containment system, interceptor system, or other proposed methods for the management of hazardous substances** 8. Conditions to monitor compliance associated with any stormwater treatment system, or hydrological control measures,**or measures required under condition (e).** Notification In respect of Rule WH.R7, applications are precluded from limited and public notification (unless special circumstances exist). ~~Note~~ ~~For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to Rule WH.R11.~~

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S248.035	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Amend	Opposes default discretionary activity status for new or redeveloped impervious surfaces at high risk industrial or trade premises for reasons set out in its submission of rules WH.R5, WH.R6 and WH.R7. Considers a reasonable level of new or redeveloped impervious surfaces should be provided for as a permitted or controlled activity under rules WH.R5, WH.R6 and WH.R7, subject to appropriate conditions to manage the potential adverse effects associated with hazardous substances. As per submission on policy WH.P15, considers it is not consistent with NPS-FM to require mandatory financial contributions for purposes of aquatic offsetting, as the effects management hierarchy in NPS-FM only requires offsetting in circumstances where residual adverse effects are more than minor. Where residual adverse effects are more than minor, applicants should have opportunity to propose aquatic offsetting or compensation in accordance with Appendix 6 or 7 of the NPS-FM. Considers it inappropriate to require financial contributions as a condition. Where aquatic offsetting or compensation (which may include financial contributions under Schedule 30) is considered to be necessary, this can be provided for as a condition of consent with reference to requirements of policy WH.P15.	Amend as follows: Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or Rule WH.R7, or prohibited under WH.R13 is a discretionary activity provided the following conditions are is met: (a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), ~~and.~~ ~~(b) if the proposal is for greenfield development a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions).~~
S248.036	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Amend	Considers the move to non-complying activity status for all other stormwater discharges is not clearly explained or justified in section 32 report. Concerned with the jump between permitted activity status for stormwater discharges under rules WH.R2, WH.R3, and WH.R4, and non-complying activity status under this rule. Minor non-compliances with conditions under these rules will trigger the non-complying activity rule. Notes non-complying activity status for minor	Amend rule as follows: Rule WH.R12: All other stormwater discharges - ~~non-complying~~ **discretionary** activity The: (a) discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule WH.R2, or (b) discharge of stormwater into water or onto or into land

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				breaches rule conditions can be a particular issue for development or upgrading existing assets, which can involve complex, bundled consents for a broad range of activities, some of which may have adverse effects that are more than minor. Notes this leads to a high degree of uncertainty as to whether consents for development or upgrading of Ara Poutama's assets will be granted under section 104D of RMA, even where minor non-compliances with stormwater conditions under rules WH.R2, WH.R3, or WH.R4 can be appropriately addressed through consent conditions. Considers non-complying activity rule is not sufficiently justified in section 32 report and does not appropriately provide for activities that do not meet permitted activity conditions, but which can otherwise be managed through consent conditions as a discretionary activity. Submitter does consider that non-complying activity status should be retained for proposals that do not provide a Stormwater Impact Assessment under rule WH.R11, as this would clearly be contrary to objectives and policies of the Plan.	where it may enter a surface water body or coastal water, that is not permitted by Rule WH.R3, or a restricted discretionary activity under Rules WH.R8 or WH.R9, or (c) discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule WH.R4, ~~or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade premise that does not meet the conditions of Rule WH.R11, or~~ ~~(d) use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater into water or onto or into land where it may enter water, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or WH.R7, or a discretionary activity under Rule WH.R10 or WH.R11, or a prohibited activity under WH.R13,~~ is a~~non-complying~~ **discretionary** activity. As a consequential amendment, provide a new non-complying activity rule for stormwater discharges that are not a discretionary activity under rule WH.R11.
S248.037	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Considers the definition of unplanned greenfield development is too broad and uncertain. Notes it is unclear if all development is prohibited or just specific kinds of urban development. Concerns the approach could prohibit works associated with the maintenance, upgrading and development of Ara Poutama's existing assets in areas identified as "unplanned greenfield development areas" where such works are considered "greenfield development". Questions the efficiency and practicability of the proposed approach which creates jurisdictional overlap between territorial authorities, the regional council, and the Minister of Conservation on the	Delete rule.

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				management of development in "unplanned greenfield development areas". Notes that except for combined planning documents under section 80 of RMA, there are no provisions in the RMA that provide for combined hearing, decision making, and appeals on proposed changes to separate regional and district plans. Notes decisions must be made separately by the territorial authority and regional council, and in this case, any change to the unplanned greenfield development area maps must also be approved by the Minister of Conservation. Notes this is likely to be highly inefficient for those seeking changes to regional and district plans, as well as those submitting on them, and the risk of inconsistent decision making is high. Considers if it is Council's position this issue requires a combined approach with territorial authorities, then appropriate means of providing for this is through a combined planning document (and the Council is obliged to consider this under section 80(7) of the RMA). Notes that its principal concern with this rule is that it is unclear whether it would prohibit the upgrading or development of its existing assets. If the relief sought on the definition of "unplanned greenfield development" is granted in full, submitter would consider adopting a neutral position on this rule.	
S248.038	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Neutral	Submitter has neutral position on rule, subject to relief sought on Schedule 34.	Retain as notified (noting the submission points on Schedule 34).
S248.039	8 Whaitua Te	Rule WH.R21:	Neutral	Submitter has neutral position on rule, subject to relief sought on Schedule 34.	Retain as notified (noting the submission points on Schedule 34).

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	Whanganui-a-Tara	Plantation forestry - discretionary activity.			
S248.040	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.	Amend	Seeks clarification as to whether prohibition on "earthworks" and "mechanical land preparation" in rule only applies to "afforestation" as defined by NES-CF (i.e. this rule only applies to land where no commercial forestry or harvesting has occurred within the past 5 years), or whether prohibition on "earthworks" and "mechanical land preparation" applies to all new plantation forestry, including re-establishment of recently harvested forests. Considers if rule only applies to new forests as per the definition of "afforestation" in the NES-CF, submitter considers this rule is reasonable. Notes if rule applies to re-establishment of recently harvested forests, submitter considers the Prohibited activity status for this rule is unnecessarily onerous, and evidence in the Section 32 report does not support a Prohibited activity status. Considers there should be a consent pathway for re-establishing plantation forests after harvesting for reasons set out in its requested relief for Policy WH.P28.	Clarify whether the rule applies to "afforestation" only as defined by the NES-CF, or whether the rule applies to all plantation forestry, including re-establishment. If the rule applies to all plantation forestry including re-establishment, amend the rule to enable a consent pathway for re-establishing plantation forests after harvesting.
S248.041	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	Notes effect of use of "and" at the end of condition (b) is to exclude all earthworks not related to implementing farm erosion risk treatment plans or farm environmental plans from the permitted activity rule. As a result, all other earthworks, regardless of size or whether they meet conditions (c) to (h) will be a restricted discretionary activity under rule WH.R24. Considers this is an error and acknowledges Council have corrected this under clause 16 of Schedule 1 to the RMA by way of a memo published on 6 December 2023.	Amend rule as follows: Rule WH.R23: Earthworks - permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, ~~and~~ **or** (c) the area of earthworks does not exceed 3,000m2 per

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				Notes it cannot be efficient or effective to require resource consent for all earthworks, regardless of scale. Considers this does this appear to be consistent with policies WH.P30 and WH.P31, which place emphasis on controlling earthworks over 3,000m2. Considers that it is appropriate that smaller scale earthworks are generally provided for as a permitted activity under rule (subject to the conditions set out under the rule). To achieve this, "and" should be replaced with "or" at the end of condition (b). Any further changes to this rule will be dependent on how 'earthworks' are defined and any exclusions. Opposes rule being included within freshwater planning instrument, as purpose of rule is to manage land use for purposes of soil conservation. As rule does not provide for discharges associated with earthworks, there is no justification for including it in freshwater planning instrument, seeks that it be reallocated to Part 1 Schedule 1 planning instrument.	property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021). In addition to this, reallocate the rule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.
S248.042	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	Depending on the outcome of other submission points, submitter considers several amendments to the rule are necessary. Considers rule should be restructured to locate "associated discharge" element of rule to follow on from "Earthworks that do not comply with Rule WH.R23" as discharges associated with permitted earthworks are not provided for under rule WH.R23 (which only permits earthworks). Discharges from permitted earthworks are instead provided for under	Amend rule as follows: Rule WH.R24: Earthworks - restricted discretionary activity Earthworks ~~and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network,~~ that does not comply with Rule WH.R23, **and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it**

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				the "minor discharges" rule R91. Considers a condition requiring earthworks be shut down over the winter months is inappropriate, as it does not recognise circumstances where earthworks need to occur over those months in order to provide for safe and efficient operation, maintenance, upgrading, or development of regionally significant infrastructure. Recognises earthworks should be planned so majority of bulk earthworks occur outside of winter months. Considers instances where earthworks are unavoidable and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Notes GWRC Erosion and Sediment Control Guideline for Wellington Region (2021), which is referred to in policy WH.P31 (and in the note to permitted activity rule WH.R23), provides a pathway for earthworks to be undertaken during winter months subject to careful management. Considers rather than a blanket restriction on all earthworks over this period, reference is made to matters set out under section G5.0 of guideline as a matter of discretion for earthworks.	**may enter a surface water body or coastal water, including via a stormwater network, is a restricted discretionary activity, provided the following conditions are met:** **(a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than:** **(i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river,** ~~and~~ ~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~ Matters for discretion 1. The location, area, scale, volume, duration and staging and timing of works 2. The design and suitability of erosion of sediment control measures including consideration of hazard mitigation and the risk of accelerated soil erosion associated the staging of works and progressive stabilisation 3. The placement and treatment of stockpiled materials on the site, including requirements to remove material if it is not to be reused on the site 4. The proportion of unstabilised land in the catchment 5. The adequacy and efficiency of stabilisation devices for sediment control 6. Any adverse effects on: (i) groundwater, surface water bodies and their margins, particularly surface water bodies within sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori customary use) or

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					Schedule I (important trout fishery rivers and spawning waters) (ii) group drinking water supplies and community drinking water supplies (iii) mauri, water quality (including water quality in the coastal marine area), aquatic and marine ecosystem health, aquatic and riparian habitat quality, indigenous biodiversity values, mahinga kai and critical life cycle periods for indigenous aquatic species (iv) the natural character of lakes, rivers, natural wetlands and their margins and the coastal environment (v) natural hazards, land stability, soil erosion, sedimentation and flood hazard management including the use of natural buffers 7. Duration of the consent~~8. Preparation required for the close-down period (from 1st June to 30th September each year) and any maintenance activities required during this period~~ **Where earthworks will be undertaken within the period from 1 June to 30 September, the matters set out under section G5.0 of the Greater Wellington Regional Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021)** 9. Monitoring and reporting requirements **Note** **Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).**
S248.043	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Amend	Considers that the move to non-complying activity status for all other earthworks is not clearly explained or justified in the section 32 evaluation report. Non-compliance with conditions under rule WH.R25 will trigger the non-complying activity rule. Considers non-complying activity status for minor breaches of rule conditions can be a particular issue for development or upgrading of existing assets, as	Amend rule as follows: Rule WH.R25: Earthworks - ~~non-complying~~ **discretionary** activity Earthworks, and the associated discharge of sediment into a surface water body or coastal water or onto or into land where it may enter a surface water body or coastal water from earthworks, including via a stormwater network, that

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				it can sometimes involve complex, bundled consents for a broad range of activities, some of which may have adverse effects that are more than minor (for example, visual effects). Considers this leads to a high degree of uncertainty as to whether consents for development or upgrading of Ara Poutama's assets will be granted under section 104D of the RMA, even where the adverse effects of the part of the proposal that triggered non-complying activity status can be appropriately addressed through consent conditions. Considers the non-complying activity rule is not sufficiently justified in section 32 report and does not appropriately provide for activities that do not meet restricted discretionary activity conditions, but which can otherwise be managed through consent conditions as a discretionary activity.	does not comply with Rule WH.R24 is a ~~non-complying~~ **discretionary** activity.
S248.044	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	Considers policy is inappropriate because definition of "unplanned greenfield development" is broad, uncertain, and could prohibit maintenance, upgrading and development of existing assets and considers that the prohibition on unplanned greenfield development is inappropriate and must be removed. If relief sought by submitter on the definition of "unplanned greenfield development" is granted in full, submitter would adopt a neutral position on this aspect of policy. Considers amendment to policy is necessary to ensure it is consistent with effects management hierarchy set out in NPS-FM. Aquatic offsetting is only necessary where residual adverse effects are more than minor, and resource consent applicants should be encouraged to minimise residual adverse effects so they are no more than minor (in which case aquatic offsetting is not required). Further, if aquatic offsetting is required, financial contributions	Amend policy as follows: Policy P.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (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 (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load,

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				as proposed by PC1 should be available as a discretionary option for achieving offsetting, but not a mandatory requirement. If applicants can provide alternative effective methods of aquatic offsetting as part of proposal in accordance with Appendix 6 of NPS-FM, then financial contributions should not be required.	and (c) imposing hydrological controls on urban development and stormwater discharges to rivers, and (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.
S248.045	9 Te Awarua-o-Porirua Whaitua	Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises.	Amend	Considers it impracticable to avoid contaminants being entrained in stormwater and notes this is acknowledged in section 32 report and by policies such as P.P14 which recognises potential for residual stormwater contaminants associated with development. Focus of the policy is on management of hazardous substances prepared, used or stored at high risk industrial and trade premises, so reference to contaminants generally should be removed from the policy, in order that the policy is implementable and retains clear focus on the management of hazardous substances. Management of stormwater contaminants generally is provided for under policies WH.P10 and WH.P14, which will also apply to high risk industrial or trade premises.	Amend policy as follows: Policy P.P11: Discharges ~~of a contaminant~~ **hazardous substances** in stormwater from high risk industrial or trade premises The discharge of stormwater to water from a high risk industrial or trade premise shall be managed by: (a) having procedures and equipment in place to contain any spillage of hazardous substances for storage or removal, and (b) avoiding ~~contaminants or~~ hazardous substances being entrained in stormwater and discharged to a surface water body or coastal water, including via the stormwater network, or where avoidance is not practicable, implementing good management practice to avoid or minimise adverse effects on the environment including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and (c) installing an interceptor where there is a risk of petroleum hydrocarbons entering into the stormwater network, a surface water body or coastal water, and

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					(d) avoiding or mitigating adverse effects of stormwater discharges on groundwater quality.
S248.046	9 Te Awarua-o-Porirua Whaitua	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Notes raingardens and bioretention devices referred to in Clause (a)(ii) are not defined terms in the plan and both terms need to be added to Plan to provide certainty for users.	Amend the definitions section to include a definition of "raingarden" and "bioretention device".
S248.047	9 Te Awarua-o-Porirua Whaitua	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Amend	Considers policy should be amended so its consistent with effects management hierarchy set out in NPS-FM, which requires aquatic offsetting or compensation is provided in circumstances where residual adverse effects are more than minor. Considers financial contributions should not be a mandatory means of providing aquatic offsetting, and resource consent applicants should have reasonable opportunity to provide aquatic offsetting or compensation in accordance with Appendix 6 or 7 of NPS-FM as part of proposals.	Amend policy as follows: Policy P.P14: Stormwater contaminant offsetting **or compensation** for new greenfield development ~~The~~ **More than minor** adverse effects of residual (post-treatment) stormwater contaminants from new greenfield development, roads (not already captured as part of a greenfield development) and state highways where the discharge will enter a surface water body or coastal water, including via an existing or new stormwater network, are to be offset by way of:**(a) aquatic offsetting or compensation in accordance with Appendix 6 or 7 of the National Policy Statement on Freshwater Management 2020; or (b)** a financial contribution in accordance with Schedule 30 (financial contribution).
S248.048	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Oppose	Considers the definition of unplanned greenfield development is too broad and uncertain. Unclear if all development is prohibited or just specific kinds of urban development. Concerns the approach could prohibit works on prison assets or areas that are already effectively developed but are located within areas identified as "unplanned greenfield development areas", where such works are considered to be "greenfield development.	Delete policy

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				Questions the efficency and practicability of the proposed approach which creates jurisdictional overlap between territorial authorities, the regional council, and the Minister of Conservation on the management of development in "unplanned greenfield development areas". Noting decisions on separate plan changes must be made separately and considers this will be highly inefficient for applicants and submitters and applicants and risks inconsistency. Considers the appropriate means of providing for a combined regulatory approach is through a combined planning document to address the issue, as per section 80 of the RMA. If the relief sought by submitter on definition of "unplanned greenfield development" is granted in full, submitter would consider adopting a neutral position on rule.	
S248.049	9 Te Awarua-o-Porirua Whaitua	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Amend	Questions feasibility of point (c) of this policy with regard to disparate areas of high erosion risk plantation forestry land identified in Map 92. Notes under this policy, it appears harvesting plantation forestry and replanting in pine is to be avoided. Noting the incentives for replanting provided in section B3 of Schedule 27 (relating to undertaking programmes to actively support revegetation of and sediment management on highest erosion risk land (plantation forestry)), the practicality of replanting in natives can be challenging, and may result in forestry owners not replanting the land at all. Considers replanting with pine still provides benefits for stabilising erosion-prone land and considers this policy could be counterproductive. Considers this point would appear to be contrary to the Emissions Trading Scheme, which requires forests are registered to the scheme are replanted	Policy P.P26 Achieving reductions in sediment discharges from plantation forestry Reduce discharges of sediment from plantation forestry by: (a) identifying highest erosion risk land (plantation forestry), and (b) improving management of plantation forestry by requiring erosion and sediment management plans to be prepared and complied with., ~~and~~ ~~(c) requiring that on highest erosion risk land (plantation forestry), plantation forestry is not established or continued beyond the harvest of existing plantation forest.~~

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				after harvesting, as they provide important carbon sequestration benefits. Submitter seeks that point (c) of this policy be deleted and notes this policy would be subject to consequential amendments resulting from the relief it is seeking on Schedule 34.	
S248.050	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Amend	Considers the word "risk" should be replaced with "adverse effects", as resource management policies should seek to manage actual or potential adverse effects of an activity, rather than risks generally. Notes the requirement to retain soil and sediment on site under clause (a) does not recognise that soil and sediment may need to be removed from site in a controlled manner (for example, to a cleanfill area) as part of the works associated with the maintenance, upgrading, or development of existing developed sites. To recognise this, submitter considers that clause (a) should be amended to seek the uncontrolled loss of soil and sediment from site is minimised, rather than requiring all soil and sediment to be retained on site. Considers clause (b) should be qualified with "where practicable" to recognise that any limits placed on land disturbance should be reasonable and proportionate, particularly in the context of the good management practices already required by clause (a)	Amend as follows: Policy P.P27: Management of earthworks sites The ~~risk~~ **adverse effects** of sediment discharges from earthworks shall be managed by: (a) ~~requiring retention~~ **minimising the uncontrolled loss** of soil and sediment on the site using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021), for the duration of the land disturbance, and (b) limiting, **where practicable,** the amount of land disturbed at any time, and (c) designing and implementing earthworks with knowledge of the existing environmental site constraints, specific engineering requirements and implementation of controls to limit the discharge of sediment to receiving environments, and (d) requiring erosion and sediment control measures to be installed prior to, and during earthworks and ensuring those controls remain in place and are maintained until the land is stabilised against erosion.
S248.051	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for	Support	Considers standards set out in the policy to be reasonable.	Retain as notified

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		earthworks sites.			
S248.052	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose	Considers a policy requiring all earthworks over 3,000m2 to be shut down over the winter months is inappropriate, as it does not recognise there may be circumstances where earthworks need to occur over those months in order to provide for safe and efficient operation, maintenance, upgrading, or development of prison infrastructure. Considers there are instances where earthworks are unavoidable at this time, and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Notes GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), which is referred to in the policy, provides a pathway for earthworks to be undertaken during the winter months subject to careful management and considers pathway should continue to be available to applicants through consent process.	Delete policy
S248.053	9 Te Awarua-o-Porirua Whaitua	Rule P.R2: Stormwater to land - permitted activity.	Amend	Considers permitted activity conditions to be reasonable, with exception of the point (e) which implies the bore is shallow and is abstracting water from an unconfined aquifer. Notes if this is the case, it should be clarified in the standard. Considers note at the end of the rule should be amended to improve clarity. Also considers reference to "redeveloped premises" be removed, as it is addressed through separate rule cascade related to new or redeveloped impervious surfaces (rules R5 to R7).	Amend as follows: Rule P.R2: Stormwater to land - permitted activity The discharge of stormwater onto or into land, including where contaminants may enter groundwater: (a) that is not from a high risk industrial or trade premise, or (b) that does not discharge from, or to, a local authority stormwater network, is a permitted activity provided the following conditions are met: (c) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (d) the discharge shall not cause or exacerbate the flooding of any other property, and

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					(e) the discharge is not located within 20m of a **shallow** bore **(<20m depth), extracting from an unconfined aquifer,** used for water abstraction for potable supply or stock water. Note In respect of a discharge **of stormwater** from an existing high risk industrial or trade premise refer to Rule P.R4, and for discharges **of stormwater** from new ~~or redeveloped premises~~ **high risk industrial or trade premises** refer to Rule P.R10. For existing discharges from or into a local authority stormwater network refer to Rule P.R5.
S248.054	9 Te Awarua-o-Porirua Whaitua	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Amend	Considers permitted activity conditions reasonable but seeks the note at the bottom of the rule be amended to improve its clarity.	Amend rule as follows: Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity The discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, from an existing individual property (a) that is not from a high risk industrial or trade premise, or (b) that is not from a state highway, or (c) that does not discharge from, or to, a local authority stormwater network is a permitted activity, provided the following conditions are met: (d) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (e) the discharge does not contain wastewater, and (f) the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water,

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					and (g) the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (h) the discharge shall not give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life. Note In respect of the discharge **of stormwater** from an high risk industrial or trade premise refer to Rule P.R4. For discharges from an existing individual property into the stormwater network refer to Rule P.R5.
S248.055	9 Te Awarua-o-Porirua Whaitua	Rule P.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Amend	Considers limiting the application of this rule to existing high risk industrial or trade premises may result in new activities involving the likes of chemical storage or engineering-related activities being a discretionary activity under rule P.R10. Subject to amendment to condition (d), considers conditions are appropriate to manage potential adverse effects associated with stormwater discharges from existing or new high risk industrial or trade premises, as both should be provided for under the same rule. Considers condition (d) of rule should be amended to remove reference to contaminants and retain a focus on hazardous substances. Considers the term	Amend as follows: Rule P.R4: Stormwater from a~~n existing~~ high risk industrial or trade premise - permitted activity The discharge of stormwater from a~~n existing~~ high risk industrial or trade premise, into water, or onto or into land where it may enter water, including via an existing local authority stormwater network, is a permitted activity, provided the following conditions are met: (a) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and

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				"contaminants" is too broad and given purpose of managing high risk industrial or trade premises is to manage potential adverse effects associated with discharge hazardous substances, it is appropriate condition (d) manages only hazardous substances, rather than contaminants more broadly (which are managed under the remainder of the conditions). Considers note at the end of rule be deleted as part of giving effect to relief sought in this submission, as well as relief sought by submitter in relation to rules for new or redeveloped impervious surfaces.	(b) the discharge does not contain wastewater, and (c) if the discharge is to land where it may enter groundwater, (i) the discharge cannot cause or exacerbate the flooding of any other property, and (ii) the discharge is not located within 20m of a bore used for water abstraction for potable supply or stock water, and (d) any ~~contaminants stored or used on site, or~~ hazardous substances **stored or used on site,** cannot be entrained in stormwater and discharged to a surface water body or coastal water, including via the stormwater network, or (i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or (ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons, and (e) if the discharge is into a surface water body, coastal water or via an existing local authority stormwater network, the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and where the discharge is not via an existing local authority stormwater network the discharge shall also not: (f) cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (g) give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than

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					1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life. ~~Note~~ ~~For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to P.R10.~~
S248.056	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Notes some activities at prison and community corrections sites in the region are likely to be considered as "high risk industrial or trade premises" under the proposed definition (e.g. chemical / fuel storage and/or engineering-related activities). Notes proposed rules make new or redeveloped impervious surfaces at high risk industrial or trade premises a discretionary activity under rule P.R10. Concerns this could lead to perverse environmental outcomes, where impervious surfaces are left to degrade because redevelopment of the surface would require a discretionary activity consent and notes degraded impervious surfaces will be less effective at containing contaminants (including the accidental spillage of hazardous substances) than redeveloped impervious surfaces. Considers it necessary to provide for new and redeveloped impervious surfaces as permitted or controlled activity under rules P.R5, P.R6 and P.R7, subject to appropriate conditions. Considers additional conditions under (d) of rule P.R4 are appropriate to manage potential adverse effects associated with hazardous substances and	Amend rule as follows: Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or new local authority stormwater network, that is not ~~a high risk industrial or trade premise~~ or unplanned greenfield development, is a permitted activity, provided the following conditions are met: (a) the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m2 (baseline property existing impervious area as at 30th October 2023) and (b) all new building materials associated with the development shall not include exposed zinc (including galvanised steel) or copper roof, cladding and spouting materials and (c) the proposal provides hydrological control measures (for

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				considers these be incorporated into rule P.R5. Considers Condition (c)(ii) should be amended so hydrological control is only required for new impervious surfaces, as redevelopment of existing impervious surfaces will not change quantity of runoff from impervious surfaces. Seeks references to "impervious areas" (undefined) in conditions (c)(i) and (ii) be replaced with "impervious surfaces" (defined) and minor amendments made to condition (c)(ii) to improve the clarity of condition.	example rain tanks) onsite or offsite, where discharges will enter a surface water body (including via an existing local authority stormwater network): (i) for all ~~impervious areas~~ **impervious surfaces** associated with a greenfield development, or (ii) for all ~~redeveloped and~~ new ~~impervious areas~~ **impervious surfaces** ~~involving~~ greater than 30m2 ~~of impervious area of a~~ **associated with** redevelopment (of an existing urbanised property), and (d) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (e) the discharge does not contain wastewater, and (f) the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and where the discharge is not via an existing or new local authority stormwater network: (g) the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (h) the discharge shall not give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or

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					(vi) any significant adverse effects on aquatic life.**and where the new or redeveloped impervious surface is for a high risk industrial or trade premise:** **(i) any hazardous substances stored or used on site cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or** **(i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or** **(ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons.** Note Where a property connects to a local authority stormwater network, additional connection requirements and authorisations may be required by the network utility operator.~~For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to Rule P.R10.~~
S248.057	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Notes some activities at prison and community corrections sites in the region are likely to be considered as "high risk industrial or trade premises" under the proposed definition (e.g. chemical / fuel storage and/or engineering-related activities). Notes proposed rules make new or redeveloped impervious surfaces at high risk industrial or trade premises a discretionary activity under rule WH.R11. Concerns this could lead to perverse environmental outcomes, where impervious surfaces are left to degrade because redevelopment of the surface would require a discretionary activity consent and notes degraded impervious surfaces will be less effective at	Amend rule as follows: Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity The use of land for the creation of new impervious surfaces for greenfield development and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not ~~a high risk industrial or trade premise or~~ unplanned greenfield development, is a controlled activity, provided the following conditions are met:

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				containing contaminants (including the accidental spillage of hazardous substances) than redeveloped impervious surfaces. In order to provide for a reasonable level of maintenance, upgrading and development of impervious surfaces, submitter considers it necessary to provide for new and redeveloped impervious surfaces as permitted or controlled activity under rules P.R5, P.R6 and P.R7, subject to appropriate conditions. Considers additional conditions under (d) of rule P.R4 are appropriate to manage potential adverse effects associated with hazardous substances and considers these be incorporated into rule P.R6. As per submission on policy WH.P15, submitter considers it not consistent with the NPS-FM to require mandatory financial contributions for purposes of aquatic offsetting, as the effects management hierarchy in NPS-FM only requires offsetting in circumstances where residual adverse effects are more than minor. Where residual adverse effects are more than minor, applicants should have opportunity to propose aquatic offsetting or compensation in accordance with Appendix 6 or 7 of NPS-FM. Considers it is inappropriate to require financial contributions as a condition, and instead, matter of control 6 should be amended to refer to policy P.P14. This ensures appropriate aquatic offsetting or compensation (which may include financial contributions under Schedule 30) can be considered on a case by case basis, where required.	(a) the proposal involves the creation of new impervious surfaces of between 1,000m2 and 3,000m2 (baseline property existing impervious area as at 30 October 2023) or, (b) the proposal involves the creation new impervious surfaces of less than 1,000m2, but is not permitted under the conditions of Rule P.R6, and,~~(c) a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions), and~~ (d) where stormwater directly or indirectly (through an existing local authority stormwater network) discharges to a river, hydrological control is provided either: (i) on-site, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has been sized to accommodate the proposed stormwater discharges, and (e) stormwater contaminant treatment is provided that captures 85% of the mean annual runoff and directs it to a stormwater treatment system that treats in accordance with Schedule 28 (contaminant treatment) and is provided either: (i) on-site, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater treatment system that has capacity to treat contaminant loads from the site.,**and where the new impervious surface is for a high risk industrial or trade premise:** **(f) any hazardous substances stored or used on site cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or** **(i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or (ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an**

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					interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons. Matters of control 1. The design and layout of the on-site stormwater treatment system, including the ongoing operational and management measures necessary to ensure that stormwater quality will meet the requirements of condition (e) of this rule 2. The adequacy of hydrological control measures either on-site or off- site, where stormwater will enter a river 3. Where an off-site (or a combination of on-site and off-site) stormwater treatment system is utilised, whether this has capacity, availability (timing) and appropriate authorisations to connect into 4. The long-term operational, maintenance and ownership requirements of the stormwater treatment system 5. Whether sufficient use of water sensitive urban design measures have been applied to the site design and layout 6.~~A financial contribution as required by Schedule 30 (financial contributions)~~ Any aquatic offsetting or compensation proposed in accordance with policy P.P14 7. For high risk industrial or trade premises, the adequacy of any proposed containment system, interceptor system, or other proposed methods for the management of hazardous substances 8. Condition of consent to demonstrate and/or monitor compliance with conditions (d), ~~and~~ (e)**, and (f)** of this rule Notification In respect of Rule P.R6, applications are precluded from limited and public notification (unless special circumstances exist). ~~Note~~ ~~For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to Rule P.R10.~~
S248.058	9 Te Awarua-	Rule P.R7: Stormwate	Amend	Notes some activities at prison and community corrections sites in the region are likely to be	Amend rule as follows:

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	o-Porirua Whaitua	r from new and redevelop ed impervious surfaces of existing urbanised areas-controlled activity.		considered as "high risk industrial or trade premises" under the proposed definition (e.g. chemical / fuel storage and/or engineering-related activities). Notes proposed rules make new or redeveloped impervious surfaces at high risk industrial or trade premises a discretionary activity under rule P.R10. Concerns this could lead to perverse environmental outcomes, where impervious surfaces are left to degrade because redevelopment of the surface would require a discretionary activity consent and notes degraded impervious surfaces will be less effective at containing contaminants (including the accidental spillage of hazardous substances) than redeveloped impervious surfaces. In order to provide for a reasonable level of maintenance, upgrading and development of impervious surfaces, submitter considers it necessary to provide for new and redeveloped impervious surfaces as permitted or controlled activity under rules P.R5, P.R6 and P.R7, subject to appropriate conditions. Considers additional conditions under (d) of rule P.R4 are appropriate to manage potential adverse effects associated with hazardous substances and considers these be incorporated into rule P.R7.	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity The use of land for the creation of new and/or redevelopment of impervious surfaces of an existing urbanised property and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, ~~that is not a high risk industrial or trade premise,~~ is a controlled activity, provided the following conditions are met: (a) the proposal involves the creation of new, or redevelopment of impervious surfaces of between 1,000m2 and 3,000m2 (baseline property existing impervious area as at 30 October 2023) or, (b) the proposal involves the creation of new, or redevelopment of impervious areas of less than 1,000m2 but is not permitted under the conditions of Rule P.R6, and, (c) where stormwater directly or indirectly (through an existing local authority stormwater network) discharges to a river, hydrological control is provided either: (i) on-site, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has been sized to accommodate the proposed stormwater discharges, and (d) contaminant treatment of stormwater is provided either: (i) on-site through a stormwater treatment system, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater treatment system that has capacity to treat contaminant loads from the site**and where the new or redeveloped impervious surface is for a high risk industrial or trade premise:** **(e) any hazardous substances stored or used on site cannot be entrained in stormwater and enter a surface**

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					water body or coastal water, including via the stormwater network, or **(i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or** **(ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons.** Matters of control 1. Whether the design and layout of the on-site stormwater treatment system incorporates best practicable option measures to achieve (to the extent practicable) the capture of 85% of the mean annual stormwater runoff and treatment in accordance with Schedule 28 (contaminant treatment) 2. Whether the design and layout undertakes a best practicable option approach to the provision of hydrological control measures either on- site or off-site, where stormwater will enter a river 3. Where an off-site (or a combination of on-site and off-site) stormwater treatment system is utilised, whether this has capacity, availability (timing) and appropriate authorisations to connect into 4. The long-term operational, maintenance and ownership requirements of the stormwater treatment system 5. Whether there are topographical limitations influencing the provision of stormwater hydrological control and contaminant treatment 6. Whether sufficient use of water sensitive urban design methods have been applied to the site design and layout**7. For high risk industrial or trade premises, the adequacy of any proposed containment system, interceptor system, or other proposed methods for the management of hazardous substances** 8. Conditions to monitor compliance associated with any stormwater treatment system,~~or hydrological control measures,~~ **or measures required under condition (e).** Notification

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					In respect of Rule P.R~~(NEWRULE)~~**7,** applications are precluded from limited and public notification (unless special circumstances exist). ~~Note~~ ~~For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to refer to Rule P.R8.~~
S248.059	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Amend	Opposes default discretionary activity status for new or redeveloped impervious surfaces at high risk industrial or trade premises for reasons set out in its submission of rules P.R5, P.R6 and P.R7. Considers a reasonable level of new or redeveloped impervious surfaces should be provided for as a permitted or controlled activity under rules P.R5, P.R6 and P.R7, subject to appropriate conditions to manage the potential adverse effects associated with hazardous substances. As per submission on policy P.P14, considers it is not consistent with NPS-FM to require mandatory financial contributions for purposes of aquatic offsetting, as the effects management hierarchy in NPS-FM only requires offsetting in circumstances where residual adverse effects are more than minor. Where residual adverse effects are more than minor, applicants should have opportunity to propose aquatic offsetting or compensation in accordance with Appendix 6 or 7 of the NPS-FM. Considers it inappropriate to require financial contributions as a condition. Where aquatic offsetting or compensation (which may include financial contributions under Schedule 30) is considered to be necessary, this can be provided for as a condition of consent with reference to requirements of policy P.P14.	Amend rule as follows: Rule P.R10: Stormwater from new and redeveloped impervious surfaces - discretionary activity The use of land for the creation of new or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including via an existing local authority stormwater network, that is not permitted by Rule P.R5, or a controlled activity under Rule P.R6 or Rule P.R7, or prohibited under P.R12 is a discretionary activity provided the following conditions ~~are~~ **is** met: (a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), ~~and.~~ ~~(b) if the proposal is for greenfield development, a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions).~~

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S248.060	9 Te Awarua-o-Porirua Whaitua	Rule P.R11: All other stormwater discharges - non-complying activity.	Amend	Considers the move to non-complying activity status for all other stormwater discharges is not clearly explained or justified in section 32 report. Concerned with the jump between permitted activity status for stormwater discharges under rules P.R2, P.R3, and P.R4, and non-complying activity status under this rule. Minor non-compliances with conditions under these rules will trigger the non-complying activity rule. Notes non-complying activity status for minor breaches rule conditions can be a particular issue for development or upgrading existing assets, which can involve complex, bundled consents for a broad range of activities, some of which may have adverse effects that are more than minor. Notes this leads to a high degree of uncertainty as to whether consents for development or upgrading of Ara Poutama's assets will be granted under section 104D of RMA, even where minor non-compliances with stormwater conditions under rules P.R2, P.R3, or P.R4 can be appropriately addressed through consent conditions. Considers non-complying activity rule is not sufficiently justified in section 32 report and does not appropriately provide for activities that do not meet permitted activity conditions, but which can otherwise be managed through consent conditions as a discretionary activity. Submitter does consider that non-complying activity status should be retained for proposals that do not provide a Stormwater Impact Assessment under rule P.R10, as this would clearly be contrary to objectives and policies of the Plan.	Amend rule as follows: Rule P.R11: All other stormwater discharges - ~~non-complying~~ **discretionary** activity The: (a) discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule P.R2, or (b) discharge of stormwater into water or onto or into land where it may enter water, that is not permitted by Rule P.R3, or a restricted discretionary activity under Rule P.R8, or (c) discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule P.R4, ~~or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade premise that does not meet the conditions of Rule P.R10, or~~ ~~(d) use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater water or onto or into land where it may enter water, that is not permitted by Rule P.R5, or a controlled activity under Rules P.R6 or P.R7, or a discretionary activity under Rule P.R9, or a prohibited activity under Rule P.R12,~~ is a~~non-complying~~ **discretionary** activity. As a consequential amendment, provide a new non-complying activity rule for stormwater discharges that are not a discretionary activity under rule P.R10.
S248.061	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater	Oppose	Considers the definition of unplanned greenfield development is too broad and uncertain. Notes it is unclear if all development is prohibited or just specific kinds of urban development. Concerns the	Delete rule.

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		discharges from new unplanned greenfield developm ent - prohibited activity.		approach could prohibit works associated with the maintenance, upgrading and development of Ara Poutama's existing assets in areas identified as "unplanned greenfield development areas" where such works are considered "greenfield development". Questions the efficiency and practicability of the proposed approach which creates jurisdictional overlap between territorial authorities, the regional council, and the Minister of Conservation on the management of development in "unplanned greenfield development areas". Notes that except for combined planning documents under section 80 of RMA, there are no provisions in the RMA that provide for combined hearing, decision making, and appeals on proposed changes to separate regional and district plans. Notes decisions must be made separately by the territorial authority and regional council, and in this case, any change to the unplanned greenfield development area maps must also be approved by the Minister of Conservation. Notes this is likely to be highly inefficient for those seeking changes to regional and district plans, as well as those submitting on them, and the risk of inconsistent decision making is high. Considers if it is Council's position this issue requires a combined approach with territorial authorities, then appropriate means of providing for this is through a combined planning document (and the Council is obliged to consider this under section 80(7) of the RMA). Notes that its principal concern with this rule is that it is unclear whether it would prohibit the upgrading or development of its existing assets. If the relief sought on the definition of "unplanned greenfield	

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				development" is granted in full, submitter would consider adopting a neutral position on this rule.	
S248.062	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry - discretionary activity.	Neutral	Submitter has neutral position on rule, subject to relief sought on Schedule 34.	Retain as notified (noting the submission points on Schedule 34).
S248.063	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity.	Amend	Seeks clarification as to whether prohibition on "earthworks" and "mechanical land preparation" in rule only applies to "afforestation" as defined by NES-CF (i.e. this rule only applies to land where no commercial forestry or harvesting has occurred within the past 5 years), or whether prohibition on "earthworks" and "mechanical land preparation" applies to all new plantation forestry, including re-establishment of recently harvested forests. Considers if rule only applies to new forests as per the definition of "afforestation" in the NES-CF, submitter considers this rule is reasonable. Notes if rule applies to re-establishment of recently harvested forests, submitter considers the Prohibited activity status for this rule is unnecessarily onerous, and evidence in the Section 32 report does not support a Prohibited activity status. Considers there should be a consent pathway for re-establishing plantation forests after harvesting for reasons set out in its requested relief for Policy WH.P28.	Clarify whether the rule applies to "afforestation" only as defined by the NES-CF, or whether the rule applies to all plantation forestry, including re-establishment. If the rule applies to all plantation forestry including re-establishment, amend the rule to enable a consent pathway for re-establishing plantation forests after harvesting.
S248.064	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Amend	Notes effect of use of "and" at the end of condition (b) is to exclude all earthworks not related to implementing farm erosion risk treatment plans or farm environmental plans from the permitted activity rule. As a result, all other earthworks, regardless of size or whether they meet conditions (c) to (h) will be a restricted discretionary activity under rule P.R23. Considers this is an error and acknowledges	Amend rule as follows: Rule P.R22: Earthworks - permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or

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				Council have corrected this under clause 16 of Schedule 1 to the RMA by way of a memo published on 6 December 2023. Notes it cannot be efficient or effective to require resource consent for all earthworks, regardless of scale. Considers this does this appear to be consistent with policies P.P28 and P.P29, which place emphasis on controlling earthworks over 3,000m2. Considers that it is appropriate that smaller scale earthworks are generally provided for as a permitted activity under rule (subject to the conditions set out under the rule). To achieve this, "and" should be replaced with "or" at the end of condition (b). Any further changes to this rule will be dependent on how 'earthworks' are defined and any exclusions. Opposes rule being included within freshwater planning instrument, as purpose of rule is to manage land use for purposes of soil conservation. As rule does not provide for discharges associated with earthworks, there is no justification for including it in freshwater planning instrument, seeks that it be reallocated to Part 1 Schedule 1 planning instrument.	(b) the earthworks are to implement an action in the farm environment plan for the farm, ~~and~~ **or** (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021). In addition to this, reallocate the rule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.
S248.065	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Amend	Depending on the outcome of other submission points, submitter considers several amendments to the rule are necessary. Considers rule be restructured to locate "associated discharge" element of rule to follow on from "Earthworks that do not comply with Rule P.R22" as discharges associated with permitted earthworks	Amend rule as follows: Rule P.R23: Earthworks - restricted discretionary activity Earthworks ~~and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network,~~ that doe~~s~~

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				are not provided for under rule P.R22 (which only permits earthworks). Discharges from permitted earthworks are instead provided for under the "minor discharges" rule R91. Considers a condition requiring earthworks be shut down over the winter months is inappropriate, as it does not recognise circumstances where earthworks need to occur over those months in order to provide for safe and efficient operation, maintenance, upgrading, or development of regionally significant infrastructure. Recognises earthworks should be planned so majority of bulk earthworks occur outside of winter months. Considers instances where earthworks are unavoidable and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Notes GWRC Erosion and Sediment Control Guideline for Wellington Region (2021), which is referred to in policy WH.P31 (and in the note to permitted activity rule WH.R23), provides a pathway for earthworks to be undertaken during winter months subject to careful management. Considers rather than a blanket restriction on all earthworks over this period, reference is made to matters set out under section G5.0 of guideline as a matter of discretion for earthworks.	not comply with Rule P.R22, **and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, is a** restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, ~~and~~ ~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~ Matters for discretion 1. The location, area, scale, volume, duration and staging and timing of works 2. The design and suitability of erosion of sediment control measures including consideration of hazard mitigation and the risk of accelerated soil erosion associated the staging of works and progressive stabilisation 3. The placement and treatment of stockpiled materials on the site, including requirements to remove material if it is not to be reused on the site The proportion of unstabilised land in the catchment 5. The adequacy and efficiency of stabilisation devices for sediment control 6. Any adverse effects on: (i) groundwater, surface water bodies and their margins, particularly surface water bodies within sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (ecosystems and habitats with indigenous biodiversity),

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					Schedule H (contact recreation and Māori customary use) or Schedule I (important trout fishery rivers and spawning waters) (ii) group drinking water supplies and community drinking water supplies (iii) mauri, water quality (including water quality in the coastal marine area), aquatic and marine ecosystem health, aquatic and riparian habitat quality, indigenous biodiversity values, mahinga kai and critical life cycle periods for indigenous aquatic species (iv) the natural character of lakes, rivers, natural wetlands and their margins and the coastal environment (v) natural hazards, land stability, soil erosion, sedimentation and flood hazard management including the use of natural buffers 7. Duration of the consent 8.~~Preparation required for the close-down period (from 1st June to 30th September each year) and any maintenance activities required during this period~~ **Where earthworks will be undertaken within the period from 1 June to 30 September, the matters set out under section G5.0 of the Greater Wellington Regional Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021)** 9. Monitoring and reporting requirements **Note** **Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).**
S248.066	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks - non-complying activity.	Amend	Considers that the move to non-complying activity status for all other earthworks is not clearly explained or justified in the section 32 evaluation report. Non-compliance with conditions under rule P.R25 will trigger the non-complying activity rule. Considers non-complying activity status for minor	Amend rule as follows: Rule P.R24: Earthworks - ~~non-complying~~ **discretionary** activity Earthworks, and the associated discharge of sediment into a surface water body or coastal water or onto or into land where it may enter a surface water body or coastal water,

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				breaches of rule conditions can be a particular issue for development or upgrading of existing assets, as it can sometimes involve complex, bundled consents for a broad range of activities, some of which may have adverse effects that are more than minor (for example, visual effects). Considers this leads to a high degree of uncertainty as to whether consents for development or upgrading of Ara Poutama's assets will be granted under section 104D of the RMA, even where the adverse effects of the part of the proposal that triggered non-complying activity status can be appropriately addressed through consent conditions. Considers the non-complying activity rule is not sufficiently justified in section 32 report and does not appropriately provide for activities that do not meet restricted discretionary activity conditions, but which can otherwise be managed through consent conditions as a discretionary activity.	including via a stormwater network, that does not comply with Rule P.R23 is a ~~non-complying~~ **discretionary** activity.
S248.067	12 Schedules	Schedule 27: Freshwater Action Plan requirements.	Amend	Supports incentives for replanting as provided in section B3 of this schedule, relating to undertaking programmes to actively support revegetation of and sediment management on highest erosion risk land (plantation forestry). However, considers term "revegetation" used under clause B3(1)(a) potentially unclear, as it does not specify which types of vegetation it will and will not support as part of a Freshwater Action Plan. Considers the practicality of replanting in natives after harvesting plantation forests can be challenging and replanting with pine still provides benefits for stabilising erosion-prone land. Notes as an additional consideration, the Emissions Trading Scheme requires forests registered to the	Define "revegetation" in relation to B3 (1)(a) to include a range of vegetation types, including plantation forestry.

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				scheme are replanted, as they provide important carbon sequestration benefits.	
S248.068	12 Schedules	Schedule 28: Stormwater Contaminant Treatment.	Amend	Consider the target load reductions for copper and zinc outlined in Table 1 of Schedule 28 are potentially unfeasible given the levels most stormwater treatment devices can achieve are generally around 59% for zinc and 70% for copper. Submitter suggests a better way to achieve reductions in copper and zinc would be to target minimisation of suspended solids. Considers amendment to the first sentence under the heading "Target Load Reductions" is necessary in order to clarify the rules require stormwater discharges from impervious surfaces to be treated (as distinct from the surfaces themselves being treated).	Amend schedule as follows: Schedule 28: Stormwater Contaminant Treatment This schedule relates to Rules WH.R6, WH.R7, P.R6 and P.R7. Target Load Reductions~~All~~ **Stormwater discharges from** new and redeveloped impervious surfaces are to be treated to meet an equivalent target load reduction **for suspended solids.** ~~copper and zinc to those set out for a raingarden/bioretention device, as per Table 1.~~ Table 1: Target Load Reductions for Suspended Solids for Copper and Zinc**[Consequential amendments to Table 1 to include relevant suspended solids targets in Table 1.]**~~Treatment Device~~ ~~Copper~~ ~~Zinc~~ ~~Bioretention (rain garden)~~ ~~90%~~ ~~90%~~
S248.069	12 Schedules	Schedule 29: Stormwater Impact Assessments.	Amend	Seeks amendment to bullet point 3 to remove reference to redeveloped impervious surfaces. Considers no benefit in calculating volume and flow rate of discharges from redeveloped impervious surfaces, as there will be no change to discharge volume and flow rate (when compared to existing). Seeks amendment to bullet point 5 to remove references to wording that is extraneous and difficult to interpret. Wording sought to be deleted is generally covered by definition of "water sensitive urban design". Regarding bullet point 8, supports engagement with mana whenua but notes bullet point 8 creates a wide-ranging obligation to engage with mana whenua on all stormwater impact assessments,	Amend schedule as follows: Schedule 29: Stormwater Impact Assessments A stormwater impact assessment shall include the following analysis: 1. Site evaluation: the site must be assessed for its topography, soil type, land use, drainage patterns (including wetlands/water courses), natural features, topographical and geotechnical constraints and potential flood areas. 2. Catchment evaluation: analyse catchment wide characteristics and requirements (utilising existing local authority stormwater management strategies where available) to consider the proposed development in a broader stormwater discharge and receiving environment context to understand relevant catchment issues, including

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				without regard to scale and significance of the discharge. Considers this broad requirement to engage does not recognise capacity constraints for mana whenua that may make engagement on all impact assessments impractical. Seeks amendments to bullet point 8 to improve the clarity and efficiency of the requirement by: - Ensuring engagement is appropriately targeted to circumstances where the discharge is to an identified site of significance; - Where there is relevant information made available by iwi authorities about cultural values associated with waterbodies (such as through iwi management plans), these should be able to be relied on by applicants; - Focus of provision should be on the outcomes of any engagement, rather than the engagement itself; - Provision should focus on engagement with iwi authorities in the relevant catchment, rather than mana whenua generally. The term mana whenua is broadly defined and provides no certainty about the specific parties applicants should engage with. Seeks amendment to bullet point 2 under list of matters specific to high risk industrial and trade premises to replace term "contaminants" with "hazardous substances", on as the purpose of the rules is to manage potential entrainment of hazardous substances within stormwater (rather than contaminants generally).	flooding, climate change projections (frequency and volume), water quality and any additional design or mitigation measures required to address wider catchment matters. 3. Stormwater discharge calculation: calculation of stormwater discharge volumes and flow rates along with analysis of stormwater contaminant generation from and new ~~and/or redeveloped~~ impervious surfaces. 4. Identification of actual and potential stormwater impacts: undertake evaluation of the actual and potential impacts on the receiving environment, including water quality, natural flow regimes of waterways, soil erosion, flooding, changes in hydrology and climate change (frequency and volume). 5. Implementation of Water Sensitive Urban Design principles: provide an analysis of how Water Sensitive Urban Design measures have been identified and incorporated into the site design and layout, building and road/paving materials and ~~features and how existing natural features and~~ new stormwater treatment systems ~~have been enhanced and integrated to mimic natural processes.~~ 6. Mitigation measures: Assessment of proposed mitigations to reduce the effect of stormwater discharges on water quantity and quality, including the approach to treat in accordance with Schedule 28 (contaminant treatment) and implement hydrological control. Measures must support achieving relevant target attribute states (beyond zinc and copper) for ecosystem health, including nutrients, visual clarity and E. coli or enterococci. 7. Operation and maintenance of stormwater management systems: analyse the long-term (life-cycle) operational and maintenance requirements including funding mechanisms and identification of persons responsible for ongoing maintenance. 8. Cultural considerations **(where the discharge is directly to Ngā Taonga Nui a Kiwa identified in Schedule B or a Site of Significance identified in Schedule C):** to be informed by ~~engagement with mana whenua~~ **information supplied by, or the outcomes of any consultation with, the relevant iwi authorities for the catchment within which the discharge is located.**

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					Where the application includes a high risk industrial or trade premise the stormwater impact assessment analysis must also consider the following: 1. Procedures and equipment in place to contain any spillage of hazardous substances for storage or removal, to ensure these are not entrained in stormwater, and 2. Management practices proposed to avoid or minimise entrainment of ~~contaminants~~ **hazardous substances** into stormwater, including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring.
S248.070	12 Schedules	Schedule 30: Financial Contributions.	Amend	References to offsetting should be accompanied by references to compensation as there is insufficient certainty about whether the financial contribution will be used (as set out in section E) to address the residual stormwater contaminants from new impervious surfaces discharged within the catchment (which is offsetting), or whether it will be used to improve water quality across a range of values, not limited to impervious surface contaminants, in the whaitua generally (which is compensation). As per submission points on policies WH.P15 and P.P14, submitter considers applicants should be given a reasonable opportunity to undertake their own aquatic offsetting or compensation to address more than minor residual adverse effects, in line with the effects management hierarchy provided for under the NPS-FM. As per submission points on policies WH.P15 and P.P14, submitter considers an amendment to the final paragraph is necessary to reflect the NPS-FM only requires offsetting or compensation in circumstances where residual adverse effects are more than minor.	Amend schedule as follows: A Context Under section 108(2)(a) and (10) of the Resource Management Act 1991, a consent authority may impose a condition on a resource consent requiring a financial contribution to be made for the purpose of offsetting, **or compensating for,** an environmental adverse effect. The creation of impervious surfaces through new greenfield development, new roads (not directly associated with a greenfield development) and state highways will result in an increase of stormwater contaminants entering freshwater receiving environments. Stormwater contaminant treatment will be required of new development proposals, however, treatment of contaminants is only practicable for a portion of the contaminant load received from the site. This results in a residual contaminant load still entering freshwater and coastal water receiving environments. The National Policy Statement for Freshwater Management 2020 requires freshwater quality to be maintained or improved. A financial contribution ~~is~~ **may be** required to offset **or compensate for** the adverse environmental effects **(where they are more than minor)** of the residual stormwater contaminants entering freshwater receiving

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					environments where policy WH.P15 and P.P13 anticipates a deterioration of water quality could arise.
S248.071	12 Schedules	B Purpose	Amend	Considers applicants should be given a reasonable opportunity to undertake their own aquatic offsetting or compensation to address more than minor residual adverse effects, in line with effects management hierarchy provided for under NPS-FM. Considers amendments necessary to clarify the financial contribution is not for greenfield development generally, but new impervious surfaces created as part of greenfield development. Seeks references to offsetting be accompanied by references to compensation as there is insufficient certainty about whether the financial contribution will be used (as set out in section E) to address residual stormwater contaminants from new impervious surfaces discharged within catchment (which is offsetting), or whether it will be used to improve water quality across a range of values, not limited to impervious surface contaminants, in whaitua generally (which is compensation).	Amend schedule as follows: B Purpose A financial contribution ~~is~~ **may be** required for ~~all~~ **the creation of new impervious surfaces as part of new** greenfield development, new roads and state highways requiring a resource consent to offset **or compensate for more than minor** residual contaminant load from stormwater discharges entering freshwater and coastal water receiving environments to ensure the maintenance or improvement of water quality within the affected whaitua. Financial contributions collected will be utilised to fund and construct new, or upgrade existing, catchment scale stormwater treatment systems serving existing urban development, within the same whaitua and if practicable, the same part Freshwater Management Unit.
S248.072	12 Schedules	C Definition of an Equivalent Household Unit	Amend	Considers consistent terminology should be used across policies, rules and Schedule 30 when referring to impervious surfaces. As such the terms "roofing or roading/hardstand area" should be replaced with "new impervious surfaces". The term "new" is important, as financial contributions should be calculated on the basis of new surfaces, not redeveloped ones. Considers the term "dramatically" unnecessary and should be removed.	Amend schedule as follows: C Definition of an Equivalent Household Unit An Equivalent Household Unit (EHU) is the basis for assessing the residual environmental impact (measured for copper and zinc contaminants in this instance) of the development of an average-sized residential unit for the purposes of calculating a financial contribution. Each average-sized new residential unit is deemed to create one unit of impact (one EHU). Because non-residential developments and new roads/state highways (not in direct support of a greenfield development) also impact contaminant levels, but can vary ~~dramatically~~ in size, every 100m2 of ~~roofing or roading/hardstand area~~ **new impervious surface** is deemed to create one unit of impact,

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					rather than using the EHU unit of measure used for residential development. Financial contributions are calculated based on the number of EHUs expected to be delivered in greenfield areas in the two whaitua. Non-residential and new road/state highway financial contributions are calculated based on the amount of ~~roofing and roading/hardstand~~ **new impervious surface** expected.
S248.073	12 Schedules	D Calculation of level of contribution	Amend	Considers section D of schedule be amended to clarify the financial contribution is based on area of new impervious surface, not total area of development.	Amend schedule as follows: D Calculation of level of contribution Financial contributions shall be calculated per EHU for residential greenfield development (Table D1), or per 100m2 **of new impervious surface area** for non-residential greenfield development and new roads/state highways (not in direct support of a greenfield development) (Table D2). Table D1. Financial contribution calculations for residential greenfield development Whaitua Residential Financial Contribution per EHU* Whaitua Te Whanganui-a-Tara $4, 240 Te Awarua-o-Porirua Whaitua $4, 599 *dwellings with <55m2 of roof site coverage shall be charged at 0.6 of the financial contribution rate Table D2. Financial contribution calculations for non-residential greenfield development and new roads/state highways Whaitua Non-residential (i.e new commercial, industrial, town centre areas) Financial Contributions per 100m2 **of new impervious surface** New roads and state highways (not in direct support of a new greenfield development) Financial Contribution per 100m2 **of new impervious surface** Whaitua Te Whanganui-a-Tara

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					$858 $360 Te Awarua-o-Porirua Whaitua $858 $360 Financial contributions shall be imposed as a condition of consent and will be collected prior to the consent being given effect to.
S248.074	12 Schedules	E Use	Neutral	Submitter is neutral on the content of this provision, but has concerns the use of financial contributions to fund catchment scale stormwater treatment projects undertaken by the stormwater network utility operator creates a real risk of "double dipping" of the kind prohibited under section 200 of the LGA. Notes this is particularly the case as development contributions are already used to fund upgrading and development of the stormwater network. Considers it is unclear whether Council's Long-term Plan/Infrastructure Strategy provides for the catchment scale stormwater treatment projects that will be funded by the financial contribution. Notes if these are not clearly provided for in the LTP/Infrastructure Strategy, there is no certainty that financial contributions will be spent for their intended purpose. Considers if catchment scale stormwater treatment projects are not provided for in the LTP/Infrastructure Strategy, this would be contrary to section 106 of the LGA, which provides that financial contributions relate to capital expenditure in the Council's LTP.	Retain as notified
S248.075	12 Schedules	Schedule 33: Vegetation Clearance Erosion and Sediment	Oppose	Opposes schedule being included within freshwater planning instrument, as purpose of the schedule is to manage land use for the purposes of soil conservation. Seeks schedule be reallocated to the Part 1 Schedule 1 planning instrument.	Reallocate schedule so that it is of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.

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		Management Plan.			
S248.076	12 Schedules	C Requirements of the Erosion and Sediment Management Plan	Amend	Considers terms "critical source areas" and "hotspots for sediment loss to surface water" under clause (b)(ix) are unclear, and should be defined so that it is clear to plan users what these terms mean, and what is sought to be mapped under this clause.	Define the terms "critical source areas" and "hotspots for sediment loss to surface water" in relation to Schedule 33 C1(b)(ix).
S248.077	12 Schedules	C1 Contents of the Erosion and Sediment Management Plan	Amend	Considers terms "critical source areas" and "hotspots for sediment loss to surface water" under clause (b)(ix) are unclear, and should be defined so that it is clear to plan users what these terms mean, and what is sought to be mapped under this clause.	Define the terms "critical source areas" and "hotspots for sediment loss to surface water" in relation to Schedule 33 C1(b)(ix).
S248.078	12 Schedules	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	Oppose	Opposes schedule being included within freshwater planning instrument, as purpose of the schedule is to manage land use for the purposes of soil conservation. Seeks schedule be reallocated to the Part 1 Schedule 1 planning instrument.	Reallocate the schedule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.
S248.079	12 Schedules	A Purpose of the Erosion and Sediment Management Plan	Amend	In relation to clause B(2), submitter considers the term "avoid" is a very high and potentially unachievable threshold, and should be replaced with "minimise". Contained within the same clause, notes it is unclear which state the term "natural state" refers to, particularly where existing land uses have occurred for some time. In terms of measuring whether a plantation forest can achieve the same risk of sediment loss to water compared to a natural state, sediment loss from a	Amend clause B(2) to clarify the term "revegetation", and reword as follows: 2. ~~avoid~~ **minimise** an**y** increase in risk of loss of sediment to water relative to the risk of loss that exists from the land in a natural state, ... Retain clause B(3) as notified. Delete clause B(4). Delete sections C1, C2, and D.

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				plantation forest will vary over the course of its 25 year span. Submitter is neutral on clause B3, which aligns with its positions on Rules WH.R20 and P.R19, but questions the feasibility of clause B4. The practicality of replanting land with natives after harvesting a plantation forest can pose challenges and replanting with pine still provides benefits for stabilising erosion-prone land. Notes the Emissions Trading Scheme requires that forests registered to the scheme are replanted, as they provide important carbon sequestration benefits. Seeks the term "revegetation" under clause B3(1)(a) be clarified to include a range of vegetation types, including plantation forestry. Regarding the required contents, certification, and amendment of erosion and sediment management plans, the provisions in sections C1, C2, and D of this schedule appear to be a duplication of the requirements in NES-CF Schedule 4 for forestry earthworks management plans and the Regional Council's earthworks and sediment control management plan guidelines. Questions why these requirements need to be duplicated and suggests these be removed. Notes references to these requirements and guidelines can be inserted if considered necessary.	
S248.080	12 Schedules	Map 77: Habitats of nationally threatened freshwater species - Te Awarua-o-Porirua and Te Whanganu	Amend	Considers GIS mapping of riverine habitats described in Map 77 and Schedule F1 does not appear to accurately align with actual river extents. Plan users will rely on the mapping of scheduled riverine habitats to interpret spatial application of Schedule F1.	Amend GIS mapping of riverine environments described in Map 77 to accurately reflect the habitat extents covered by Schedule F1.

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		i-a-Tara (Schedule F1).			
S248.081	13 Maps	Map 86: Unplanned greenfield areas - Porirua City Council.	Oppose	Arohata Prison is located within "unplanned greenfield area" identified in Map 86. Submitter notes its principal concern with this approach is it is unclear whether it would prohibit the upgrading or development of its assets. If the relief sought by submitter on definition of "unplanned greenfield development" is granted in full, submitter would consider adopting a neutral position on this map.	Amend map to include Arohata Prison site within the "planned/existing urban area".
S248.082	13 Maps	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Oppose	Rimutaka Prison is partially located within "unplanned greenfield area" identified in Map 86. Submitter notes its principal concern with this approach is it is unclear whether it would prohibit the upgrading or development of its assets. If the relief sought by submitter on definition of "unplanned greenfield development" is granted in full, submitter would consider adopting a neutral position on this map.	Amend map to include Rimutaka Prison site within the "planned/existing urban area".
S248.083	13 Maps	Map 92: Highest erosion risk land (Plantation forestry) - Te Awarua-o-Porirua.	Amend	Parts of the Arohata Prison site are located near land that is mapped as "Highest erosion risk land (Plantation forestry)" in Map 91. Notes the mapping of "Highest erosion risk land (Plantation forestry)" includes many small areas of identified land that are incohesive (the size of each individual square identified in the maps is 5m by 5m). Submitter questions the value of regulating small, incohesive areas of plantation forestry. Considers to ensure the maps are efficient to administer and effective at achieving their intended outcome, the maps should be amended to only identify cohesive areas of plantation forestry, and remove incohesive or isolated areas.	Amend Map 92, and the associated GIS map layer, to only identify cohesive areas of "Highest erosion risk land (Plantation Forestry)".

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S248.084	13 Maps	Map 93: Highest and high erosion risk land (Pasture) - Te Whanganui-a-Tara.	Amend	Parts of the Rimutaka Prison site are located near land that is mapped as Highest erosion risk land (Woody vegetation), (Pasture), and (Plantation forestry) in Maps 93, 94, and 95. Notes the mapping of Highest erosion risk land (Woody vegetation), (Pasture), and (Plantation forestry) includes many small areas of identified land that are incohesive (the size of each individual square identified in the maps is 5m by 5m). Submitter questions the value of regulating small, incohesive areas of woody vegetation, pasture, and plantation forestry. Considers to ensure the maps are efficient to administer and effective at achieving their intended outcome, the maps should be amended to only identify cohesive areas of woody vegetation, pasture, and plantation forestry, and remove incohesive or isolated areas.	Amend Maps 93, 94, and 95 and the associated GIS map layer, to only identify cohesive areas of "Highest erosion risk land (Woody vegetation), (Pasture), and (Plantation Forestry)��.
S248.085	13 Maps	Map 94: Highest erosion risk land (Woody vegetation clearance) - Te Whanganui-a-Tara.	Amend	Parts of the Rimutaka Prison site are located near land that is mapped as Highest erosion risk land (Woody vegetation), (Pasture), and (Plantation forestry) in Maps 93, 94, and 95. Notes the mapping of Highest erosion risk land (Woody vegetation), (Pasture), and (Plantation forestry) includes many small areas of identified land that are incohesive (the size of each individual square identified in the maps is 5m by 5m). Submitter questions the value of regulating small, incohesive areas of woody vegetation, pasture, and plantation forestry. Considers to ensure the maps are efficient to administer and effective at achieving their intended outcome, the maps should be amended to only identify cohesive areas of woody vegetation, pasture, and plantation forestry, and remove incohesive or isolated areas.	Amend Maps 93, 94, and 95 and the associated GIS map layer, to only identify cohesive areas of "Highest erosion risk land (Woody vegetation), (Pasture), and (Plantation Forestry)".
S248.086	13 Maps	Map 95: Highest	Amend	Parts of the Rimutaka Prison site are located near land that is mapped as Highest erosion risk land	Amend Maps 93, 94, and 95 and the associated GIS map layer, to only identify cohesive areas of "Highest erosion risk

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		erosion risk land (Plantation forestry) - Te Whanganui-a-Tara.		(Woody vegetation), (Pasture), and (Plantation forestry) in Maps 93, 94, and 95. Notes the mapping of Highest erosion risk land (Woody vegetation), (Pasture), and (Plantation forestry) includes many small areas of identified land that are incohesive (the size of each individual square identified in the maps is 5m by 5m). Submitter questions the value of regulating small, incohesive areas of woody vegetation, pasture, and plantation forestry. Considers to ensure the maps are efficient to administer and effective at achieving their intended outcome, the maps should be amended to only identify cohesive areas of woody vegetation, pasture, and plantation forestry, and remove incohesive or isolated areas.	land (Woody vegetation), (Pasture), and (Plantation Forestry)".

S173 ARAKURA PLAINS DEVELOPMENT LIMITED

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S173.001	General comments	General comments - overall	Oppose	Opposes the entirety of PC1	1. Withdrawal of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks); OR 2. Should the relief sought in point 1) not occur, the Submitter seeks the relief set out in their submission; AND 3. Any other relief (including consequential relief) to give effect to the decisions sought as part of the submission
S173.002	General comments	General comments - overall	Oppose	Notes several drafting errors which create unintended consequences for housing and land development because the provisions have immediate legal effect.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S173.003	General comments	General comments - urban development	Oppose	Opposes non-complying activity status for winter earthworks. Considers current approach to managing winter earthworks is effective. Considers that a blanket non-complying activity status does not take into account the scale, nature or duration of works. Considers the requirement to stabilise earthworks and implement sediment controls prior to shut down may not be feasible resulting in unintended environmental outcomes. Concerned the prescribed shut down period may not align with specific site conditions. Considers blanket restrictions do not effectively address the diversity of different sites and applicants which demonstrate the required management of winter works should be supported to avoid delays of housing supply.	Not stated
S173.004	General comments	General comments - unplanned greenfield development	Oppose	Opposes new provisions relating to unplanned development, and that they deny a consenting pathway for proposals that may have positive outcomes for the community or for freshwater. Notes the s32 evaluation suggest that contaminants can be addressed through a combination of treatment and financial contributions, therefore considers prohibited activity status inappropriate. Considers the need for two plan changes to enable greenfield development poses challenges for the private sector's responsiveness to housing needs, and is onerous and costly. Considers the approach may jeopardise the economic viability of development and hinder the supply of affordable housing.	Not stated
S173.005	General comments	General comments - stormwater management	Oppose	Considers there is insufficient detail on the types of hydrological controls and WSUD are required for various types and scales of development. Considers the standards pose significant burdens on property owners and developers. Considers that engineering advice should not be necessary for the creation of small impervious areas, noting a permitted activity rule for 30m2 of impervious areas. Considers PC1	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				does not adequately evaluate financial costs on landowners, developers and ratepayers, including flow-on costs on the commercial viability of housing supply and affordability.	
S173.006	General comments	General comments - urban development	Oppose	Considers implications of PC1 on affordability of housing and land development will be significant and are not appropriately addressed. Considers financial contributions for new residential units will have cascading effects on housing affordability and new requirements are inconsistent with provisions relating to housing affordability in the NPS-UD, and are not addressed in the s32 report. Opposes Schedule 30 and associated provisions and considers the financial contribution requirements burdensome and will adversely affect housing availability and affordability. Considers PC1 and its supporting documentation does not assess impacts on landowners and developers. Notes potential impacts on the commercial viability of the private sector and considers a mandatory flat fee financial contribution may incentivise large lots over intensification, which is inconsistent with Objective 2 and associated policies of the NPS-UD, and is not addressed in the s32 report. Considers the policy relies on financial contributions without consideration for alternatives or acknowledgement of changes in land use that may improve water quality, highlighting limitations due to stormwater contaminant treatment only being practicable for a portion of the contaminant load. Highlights lack of clarity on the feasibility, effectiveness and timing of mechanisms outlined in the schedule. Opposes clarification from GWRC that financial contributions will be required for developments achieving reductions greater than 85%. Considers the proposed contributions are not effects-based.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S173.007	2 Interpretation	Hydrological control	Amend	Considers the definition will not assist in the interpretation of provisions as it does not outline actual controls. Notes the definition of "stormwater treatment system" provides examples as well as specifications in Schedule 28.	Amend definition to outline what hydrological controls are, including examples and a schedule with technical standards.
S173.008	2 Interpretation	Impervious surfaces	Amend	Considers a roof with rainwater collection should be not be considered an impervious surface where it complies with hydraulic neutrality rules. Considers the implementation of greywater reuse is not a regulatory requirement and will significantly add to development costs.	Amend definition as follows and make any other consequential relief necessary to give effect to this submission point: Surfaces that prevent or significantly impede the infiltration of stormwater into soil or the ground, includes: roofs, paved areas (including sealed/compacted metal) such as roads, driveways, parking areas, sidewalks/foot paths or patios, and excludes: grassed areas, gardens and other vegetated areas, porous or permeable paving, slatted decks which allow water to drain through to a permeable surface, porous or permeable paving and living roofs, roof areas with rainwater collection ~~and reuse, any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)~~
S173.009	2 Interpretation	Redevelopment	Amend	Seeks for the definition to exclude extensions to existing buildings, to allow a permitted baseline for small redevelopment of existing sites.	Amend definition as follows and make any other consequential relief necessary to give effect to this submission point: For the purpose of assessment of a proposal involving the redevelopment of an existing urbanised property (i.e **including** brownfield development upgrades to existing roads etc.) in relation to stormwater effects. this includes the replacement, reconstruction or addition (new) of impervious surfaces. Excludes: minor maintenance or repairs to roads, carparking areas, driveways and paving, installation, maintenance or repair of underground infrastructure or network utilities requiring trenching and resurfacing, activities that only involve the re-roofing of existing buildings, **extensions to existing buildings**
S173.010	2 Interpretation	Unplanned greenfield	Oppose	Notes the definition is associated with prohibited activity rules, which are opposed by the submitter.	Delete definition

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		development			
S173.011	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	Opposes provisions for unplanned greenfield growth. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. Notes that the s32 report states that all contaminants can be mitigated through treatment and financial contributions, and considers that prohibited activity status is inappropriate in this case. Further considers the prohibited activity status inconsistent with Policy 8 of the NPS-UD. Notes that the s32 report sets out the prohibited activity status to require both a regional and district plan change to enable greenfield development. Considers the need for two plan changes will be expensive and will make it difficult for market responsiveness to the provision of housing.	Amend policy as follows and make any other consequential relief necessary to give effect to this submission point: Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (a) ~~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 (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers, and (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.
S173.012	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of	Amend	Considers there is insufficient detail on the types of hydrological controls and WSUD are required for various types and scales of development. Considers that clauses (a), (b) and (c) may pose significant burdens on property owners and developers.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		stormwater discharges.		Considers that communal stormwater treatment may not be practical in all scenarios. Considers that engineering advice should not be necessary for the creation of small impervious areas, noting a permitted activity rule for 30m2 of impervious areas. Considers the s32 report does not adequately assesses the costs of PC1 on landowners and developers, nor the broader impacts on urban growth and housing supply.	
S173.013	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Oppose	Opposes the proposed financial contributions framework. Recognises the importance of managing stormwater contaminants, however considers financial contribution requirements burdensome, hindering greenfield development, housing availability and affordability. Considers costs to landowners/developers are not assessed, including flow-on impacts on housing supply and affordability, and consequential effects on commercial viability to provide for urban growth. Considers a mandatory flat fee financial contribution may incentivise large lots over intensification. Considers the policy relies on financial contributions without consideration for alternatives or acknowledgement of changes in land use that may improve water quality, highlighting limitations due to stormwater contaminant treatment only being practicable for a portion of the contaminant load. Highlights lack of clarity on the feasibility, effectiveness and timing of mechanisms outlined in the schedule. Opposes clarification from GWRC that financial contributions will be required for developments achieving reductions greater than 85%. Considers the proposed contributions are not effects-based.	Delete policy
S173.014	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges	Oppose	Opposes the avoidance/prohibited approach to greenfield development. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for	Delete policy

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		from new unplanned greenfield development.		freshwater. Considers the prohibited activity status is inconsistent with the NPS-UD.	
S173.015	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose	Opposes non-complying activity status for winter earthworks. Notes that large storm events can occur throughout the year, resulting in large sediment discharges. Considers current approach to managing winter earthworks is effective. Considers that a blanket non-complying activity status does not take into account the scale, nature or duration of works. Considers the requirement to stabilise earthworks and implement sediment controls prior to shut down may not be feasible resulting in unintended environmental outcomes. Concerned the prescribed shut down period may not align with specific site conditions. Considers blanket restrictions do not effectively address the diversity of different sites and applicants which demonstrate the required management of winter works should be supported to avoid delays of housing supply.	Delete policy
S173.016	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Amend	Considers the rule requires new connections to the stormwater network to obtain regional resource consent, whereas new connections to discharge to the network are controlled by territorial authorities.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule WH.R2: Stormwater to land - permitted activity The discharge of stormwater onto or into land, including where contaminants may enter groundwater: (a) that is not from a high risk industrial or trade premise, or (b) **that is not connected to** ~~that does not discharge from, or to,~~ a local authority stormwater network, is a permitted activity provided the following conditions are met: (...)
S173.017	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual	Amend	Considers the rule requires new connections to the stormwater network to obtain regional resource consent, whereas new connections to discharge to the network are controlled by territorial authorities.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity The discharge of stormwater from an existing individual

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		property to surface water or coastal water - permitted activity.			property into water, or onto or into land where it may enter a surface water body or coastal water, (a) that is not from a high risk industrial or trade premise, or (b) that is not from a port, airport or state highway, or (c) **that is not connected to** ~~does not discharge from, or to,~~ a local authority stormwater network, is a permitted activity, provided the following conditions are met: (...)
S173.018	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Considers there is insufficient detail on the types of hydrological controls and WSUD are required for various types and scales of development. Considers the conditions may pose significant burdens on property owners and developers. Considers that engineering advice should not be necessary for the creation of small impervious areas, noting a permitted activity rule for 30m2 of impervious areas. Considers that costs to landowners, developers, ratepayers are not assessed, including flow-on costs on commercial viability of housing supply and affordability.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.
S173.019	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Considers there is insufficient detail on the types of hydrological controls and WSUD are required for various types and scales of development. Considers the conditions may pose significant burdens on property owners and developers. Considers that engineering advice should not be necessary for the creation of small impervious areas, noting a permitted activity rule for 30m2 of impervious areas. Considers that costs to landowners, developers, ratepayers are not assessed, including flow-on costs on commercial viability of housing supply and affordability.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.
S173.020	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped	Amend	Considers there is insufficient detail on the types of hydrological controls and WSUD are required for various types and scales of development. Considers the conditions may pose significant burdens on property owners and developers. Considers that engineering advice should not be necessary for the creation of small impervious areas, noting a	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.

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		impervious surfaces of existing urbanised areas - controlled activity.		permitted activity rule for 30m2 of impervious areas. Considers that costs to landowners, developers, ratepayers are not assessed, including flow-on costs on commercial viability of housing supply and affordability.	
S173.021	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Amend	Opposes financial contributions for residual stormwater contaminants. Considers the proposed financial contributions framework does not recognise that greenfield developments may improve contaminant discharges. Considers the imposition of financial contributions as outlined in Schedule 30 places burden on developers and may hinder greenfield development and further exacerbate commercial viability of affordable housing supply.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or Rule WH.R7, or prohibited under WH.R13 is a discretionary activity provided the following conditions are met: (a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), ~~and~~ ~~(b) if the proposal is for greenfield development a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions).~~
S173.022	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-	Amend	Opposes the avoidance/prohibited approach to greenfield development. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. Considers the prohibited activity status is inconsistent with the NPS-UD.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule WH.R12: All other stormwater discharges - non-complying activity The: (a) discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		complying activity.			permitted by Rule WH.R2, or (b) discharge of stormwater into water or onto or into land where it may enter a surface water body or coastal water, that is not permitted by Rule WH.R3, or a restricted discretionary activity under Rules WH.R8 or WH.R9, or (c) discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule WH.R4, or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade premise that does not meet the conditions of Rule WH.R11, or (d) use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater into water or onto or into land where it may enter water, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or WH.R7, or a discretionary activity under Rule WH.R10 or WH.R11, ~~or a prohibited activity under WH.R13,~~ is a non-complying activity.
S173.023	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Opposes the avoidance/prohibited approach to greenfield development. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. Considers the prohibited activity status is inconsistent with the NPS-UD.	Delete rule
S173.024	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	Considers the "and" after clause (b) means earthworks not on a farm require consent and is unlikely the intent of the rule.	Rule WH.R23: Earthworks - permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, ~~and~~ **or** (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).
S173.025	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	Opposes non-complying activity status for winter earthworks. Notes that large storm events can occur throughout the year, resulting in large sediment discharges. Considers current approach to managing winter earthworks is effective. Considers that a blanket non-complying activity status does not take into account the scale, nature or duration of works. Considers the requirement to stabilise earthworks and implement sediment controls prior to shut down may not be feasible resulting in unintended environmental outcomes. Concerned the prescribed shut down period may not align with specific site conditions. Considers blanket restrictions do not effectively address the diversity of different sites and applicants which demonstrate the required management of winter works should be supported to avoid delays of housing supply.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule WH.R24: Earthworks - restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and ~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~
S173.026	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	Opposes provisions for unplanned greenfield growth. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. Notes that the s32 report states that all contaminants can be mitigated through treatment and financial contributions, and considers that prohibited activity status is inappropriate. 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.	Amend policy as follows and make any other consequential relief necessary to give effect to this submission point: Policy P.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (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 (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers, and (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.
S173.027	9 Te Awarua-	Policy P.P10: Managing	Amend	Considers there is insufficient detail on the types of hydrological controls and WSUD are required for various types and scales of development. Considers	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	adverse effects of stormwater discharges.		the conditions pose significant burdens on property owners and developers. Considers that engineering advice should not be necessary for the creation of small impervious areas, noting a permitted activity rule for 30m2 of impervious areas.	
S173.028	9 Te Awarua-o-Porirua Whaitua	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Oppose	Opposes financial contributions for residual stormwater contaminants. Considers the proposed policy and financial contributions framework does not recognise that greenfield developments may improve contaminant discharges. Considers the imposition of financial contributions as outlined in Schedule 30 places burden on developers and may hinder greenfield development and further exacerbate commercial viability of affordable housing supply.	Delete policy
S173.029	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Oppose	Opposes the avoidance/prohibited approach to greenfield development. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. Considers the prohibited activity status is inconsistent with the NPS-UD.	Delete policy
S173.030	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose	Opposes non-complying activity status for winter earthworks. Notes that large storm events can occur throughout the year, resulting in large sediment discharges. Considers current approach to managing winter earthworks is effective. Considers that a blanket non-complying activity status does not take into account the scale, nature or duration of works. Considers the requirement to stabilise earthworks and implement sediment controls prior to shut down may not be feasible resulting in unintended environmental outcomes. Concerned	Delete policy

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				the prescribed shut down period may not align with specific site conditions. Considers blanket restrictions do not effectively address the diversity of different sites and applicants which demonstrate the required management of winter works should be supported to avoid delays of housing supply.	
S173.031	9 Te Awarua-o-Porirua Whaitua	Rule P.R2: Stormwater to land - permitted activity.	Amend	Considers the rule requires new connections to the stormwater network to obtain regional resource consent, whereas new connections to discharge to the network are controlled by territorial authorities.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule P.R2: Stormwater to land - permitted activity The discharge of stormwater onto or into land, including where contaminants may enter groundwater (a) that is not from a high risk industrial or trade premise, or (b) **that is not connected to** ~~that does not discharge from, or to,~~ a local authority stormwater network is a permitted activity provided the following conditions are met: (...)
S173.032	9 Te Awarua-o-Porirua Whaitua	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Amend	Considers the rule requires new connections to the stormwater network to obtain regional resource consent, whereas new connections to discharge to the network are controlled by territorial authorities.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity The discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, from an existing individual property (a) that is not from a high risk industrial or trade premise, or (b) that is not from a state highway, or (c) **that is not connected to** ~~that does not discharge from, or to,~~ a local authority stormwater network is a permitted activity provided the following conditions are met: (...)
S173.033	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious	Amend	Considers there is insufficient detail on the types of hydrological controls and WSUD are required for various types and scales of development. Considers the conditions pose significant burdens on property owners and developers. Considers that engineering advice should not be necessary for the creation of	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		surfaces - permitted activity.		small impervious areas, noting a permitted activity rule for 30m2 of impervious areas.	
S173.034	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Considers there is insufficient detail on the types of hydrological controls and WSUD are required for various types and scales of development. Considers the conditions pose significant burdens on property owners and developers.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.
S173.035	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas- controlled activity.	Amend	Considers there is insufficient detail on the types of hydrological controls and WSUD are required for various types and scales of development. Considers the conditions pose significant burdens on property owners and developers. Considers that engineering advice should not be necessary for the creation of small impervious areas, noting a permitted activity rule for 30m2 of impervious areas.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.
S173.036	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious surfaces- discretionary activity.	Amend	Opposes financial contributions for residual stormwater contaminants. Considers the proposed financial contributions framework does not recognise that greenfield developments may improve contaminant discharges. Considers the imposition of financial contributions as outlined in Schedule 30 places burden on developers and may hinder greenfield development and further exacerbate commercial viability of affordable housing supply. Considers the feasibility, effectiveness and timing of catchment scale stormwater treatment systems that collected funds will be used for is unclear.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule P.R10: Stormwater from new and redeveloped impervious surfaces - discretionary activity The use of land for the creation of new or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including via an existing local authority stormwater network, that is not permitted by Rule P.R5, or a controlled activity under Rule P.R6 or Rule P.R7, or prohibited under P.R12 is a discretionary activity provided

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					the following conditions are met: (a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), and ~~(b) if the proposal is for greenfield development, a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions).~~
S173.037	9 Te Awarua-o-Porirua Whaitua	Rule P.R11: All other stormwater discharges - non-complying activity.	Amend	Opposes the avoidance/prohibited approach to greenfield development. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. Considers the prohibited activity status is inconsistent with the NPS-UD.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule P.R11: All other stormwater discharges - non-complying activity The: (a) discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule P.R2, or (b) discharge of stormwater into water or onto or into land where it may enter water, that is not permitted by Rule P.R3, or a restricted discretionary activity under Rule P.R8, or (c) discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule P.R4, or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade premise that does not meet the conditions of Rule P.R10, or (d) use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater water or onto or into land where it may enter water, that is not permitted by Rule P.R5, or a controlled activity under Rules P.R6 or P.R7, or a discretionary activity under Rule P.R9, ~~or a prohibited activity under Rule P.R12,~~ is a non-complying activity.
S173.038	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges	Oppose	Opposes the avoidance/prohibited approach to greenfield development. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for	Delete rule

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		from new unplanned greenfield development - prohibited activity.		freshwater. Considers the prohibited activity status is inconsistent with the NPS-UD.	
S173.039	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Amend	Considers the "and" after clause (b) means earthworks not on a farm require consent and is unlikely the intent of the rule.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule P.R22: Earthworks - permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, ~~and~~ **or** (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					Control Guide for Land Disturbing Activities in the Wellington Region (2021).
S173.040	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Amend	Opposes non-complying activity status for winter earthworks. Notes that large storm events can occur throughout the year, resulting in large sediment discharges. Considers current approach to managing winter earthworks is effective. Considers that a blanket non-complying activity status does not take into account the scale, nature or duration of works. Considers the requirement to stabilise earthworks and implement sediment controls prior to shut down may not be feasible resulting in unintended environmental outcomes. Concerned the prescribed shut down period may not align with specific site conditions. Considers blanket restrictions do not effectively address the diversity of different sites and applicants which demonstrate the required management of winter works should be supported to avoid delays of housing supply.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule P.R23: Earthworks - restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and ~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~
S173.041	12 Schedules	Schedule 30: Financial Contributions.	Oppose	Opposes the proposed financial contributions framework. Recognises the importance of managing stormwater contaminants, however considers financial contribution requirements burdensome, hindering greenfield development and housing availability. Considers the policy relies on financial contributions without consideration for alternatives or acknowledgement of changes in land use that may improve water quality, highlighting limitations due to stormwater contaminant treatment only being practicable for a portion of the contaminant load. Highlights lack of clarity on the feasibility, effectiveness and timing of mechanisms outlined in the schedule. Opposes clarification from GWRC	Delete Schedule 30.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				that financial contributions will be required for developments achieving reductions greater than 85%. Considers the proposed contributions are not effects-based.	
S173.042	13 Maps	Map 86: Unplanned greenfield areas - Porirua City Council.	Oppose	Opposes the avoidance/prohibited approach to greenfield development. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. Considers the prohibited activity status is inconsistent with the NPS-UD.	Delete map
S173.043	13 Maps	Map 87: Unplanned greenfield areas - Wellington City Council.	Oppose	Opposes the avoidance/prohibited approach to greenfield development. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. Considers the prohibited activity status is inconsistent with the NPS-UD.	Delete map.
S173.044	13 Maps	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Oppose	Opposes the avoidance/prohibited approach to greenfield development. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. Considers the prohibited activity status is inconsistent with the NPS-UD.	Delete map.
S173.045	13 Maps	Map 89: Unplanned greenfield areas - Hutt City Council.	Oppose	Opposes the avoidance/prohibited approach to greenfield development. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. Considers the prohibited activity status is inconsistent with the NPS-UD.	Delete map.

S014 Bede Crestani

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S14.001	General comments	General comments - consultation	Amend	Submission period not long enough to provide response given the document size.	Not stated
S14.002	4 Policies	Policy P70: Minimising effects of rural land use activities.	Amend	Concern it is not possible to economically plant small pockets of land, and conditions make planting viable only in protected areas. Concern their land would have to be retired.	Remove the need to plant or retire land if the discharge is acceptable, otherwise come up with an appropriate treatment. Seeks current discharge quality be determined before deciding on the action to maintain or improve.
S14.003	4 Policies	Policy P73: Implementation of farm environment plans in priority catchments.	Amend	Concerns about time and cost needed to check stream quality and risk areas of the farm under different weather conditions prior to putting a plan together.	Seeks development of water quality tests and plans to understand causes before being required to prepare Farm Environment Plan, allow 5 years for implementation.

S254 Best Farm Ltd

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S254.001	General comments	General comments - consultation	Oppose	Considers there has been a lack of consultation on PC1. Considers little or no consideration has been given to the NPS-UD, and that there is a disconnect between the outcomes being sought by territorial	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		engagement		authorities giving effect to the NPS-UD through urban area intensification and green field areas.	
S254.002	General comments	General comments - consultation	Oppose	Considers there is little or no consideration given in the plan change to the NPS-Urban Development 2020 that has equal status in the RMA plan hierarchy.	Not stated
S254.003	General comments	General comments - urban development	Oppose	Considers there is a disjoint between the outcomes being sought by the Territorial Authorities who are giving effect to the NPS-UD and are actively promoting new growth through both intensification of the existing urban area and green field areas.	Not stated
S254.004	General comments	General comments - overall	Oppose	Opposes the plan change.	The plan change be withdrawn or alternatively the hearing be suspended until the direction of the new government is clear.
S254.005	2 Interpretation	Earthworks	Amend	Notes the definition of earthworks has been expanded and therefore opening a trench to install services would trigger the need for a resource consent if the area of disturbance exceeded 3000m2.	The original definition be retained or the definition be amended by adding activities such as service trenches and scraping a site for the purpose of determining site levels to the exclusions list.
S254.006	2 Interpretation	Hydrological control	Amend	Considers the definition is vague and ambiguous, noting 'range' does not define what event or flow scenario must be attenuated or controlled, and that the requirement to 'replicate' natural processes is onerous and likely impossible to achieve.	Simplify the definition to state the design event that must be controlled and delete 'in a way that replicated natural processes'.
S254.007	9 Te Awarua-o-Porirua Whaitua	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Considers the associated rule that 85% of mean annual runoff volume from new impervious surfaces must be treated is excessive and unreasonable.	Amend the policy to a more reasonable volume such as 50%.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S254.008	9 Te Awarua-o-Porirua Whaitua	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Oppose	Does not support the financial contribution as per Schedule 30 to offset residual stormwater contaminants as it will contribute to increasing unaffordability of homes. Considers this excessive and unreasonable (refer submission point on Schedule 30)	Delete the policy.
S254.009	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Oppose	Considers the policy effectively ring-fences the City and provides an urban fence that could not be breached. Suggests GWRC would never support a plan change application and the approach flies in the face of the local authorities' responsibility to provide for their own growth. Considers the policy is a back-door way of achieving a specific and unreasonable stormwater management approach.	Delete the policy.
S254.010	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Amend	Notes that for turbidity to be measured using a new method of Total Suspended Solids requires a laboratory test to measure and cannot readily be done in the field.	Amend the Policy to refer to an NTU standard.
S254.011	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose	Considers it is entirely possible and reasonable to work into June or start in September after a dry winter and argues against preventing earthworks during these months. Notes such an approach has been in place for many years but does not work and unreasonably affects business operations.	Delete the policy or amend to have more flexibility for winter works.
S254.012	9 Te Awarua-	Rule P.R5: Stormwater from new	Oppose	Considers the rule is poorly written and will restrict development in the City, and focusses on improving water quality at any cost including the achievement	Delete the policy or amend to exclude roads and the redevelopment of existing

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	and redeveloped impervious surfaces - permitted activity.		of outcomes sought under other National Policy Statements (including the NPS-UD). Considers the rule in its current form will increase the cost of land and housing with social impacts for communities that GW have disregarded, and equates to another tax on development which will increase costs for all.	urbanised properties, and for all other activities captured have a higher threshold for permitted activities e.g. 4000m².
S254.013	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Oppose	Considers area threshold to be too low and arbitrary and objects to the introduction of a financial contribution to offset residual effects. Considers an additional tax on land will contribute to housing unaffordability and that developers already pay development contributions to local authorities, and considers it unreasonable to collect the tax prior to consent being given effect to. Notes the schedule also requires the tax be based on the number of EHU's expected to be delivered which is impossible if the application relates simply to earthworks. Concerns about who will be charged with calculating this and what happens if any future development delivers less than what was calculated.	Delete the rule
S254.014	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas- controlled activity.	Oppose	Considers stormwater from new and redeveloped impervious surfaces of existing urbanised areas should be excluded from the impervious surface rules. Does not support the continuation of the rule through to controlled status.	Delete the rule

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S254.015	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Oppose	Considers stormwater from new and redeveloped impervious surfaces of existing urbanised areas should be excluded from the impervious surface rules. Does not support the continuation of the rule through to discretionary status.	Delete the rule
S254.016	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Amend	Does not support stormwater discharges from unplanned green field development and considers the approach promotes the outcomes sought by the NPS-FM and ignores the outcomes sought by the NPS-UD. Notes there is no reference in Plan Change 1 to this NPS. Opposes prohibited activity status and considers there should always be an ability to seek a regional council consent for discharge, particularly where TA's are supporting a development in their City.	Amend R12 to be a Non-Complying Activity.
S254.017	9 Te Awarua-o-Porirua Whaitua	Rule P.R16: Vegetation clearance on highest erosion risk land-permitted activity.	Oppose	Concerns regarding the area considered to be highest erosion risk and how these were mapped, noting it appears the maps were drawn based on a desktop assessment of what is probably LIDAR data and aerial photographs. Considers this is unreliable and unsuitable for a regional plan. Notes there is no limit on area so long as you are clearing pest plants but there is no definition of this. considers the clearance of non-pest plants being limited to 200m2 as a controlled activity under R17 is too low given earthwork are permitted up to 3000m2 .	Delete the map
S254.018	9 Te Awarua-	Rule P.R17: Vegetation	Oppose	Concerns regarding the area considered to be highest erosion risk and how these were mapped, noting it appears the maps were drawn based on a	Delete the map The threshold for controlled activity status be increased to 3000m2.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	clearance on highest erosion risk land - controlled activity.		desktop assessment of what is probably LIDAR data and aerial photographs. Considers this is unreliable and unsuitable for a regional plan. Notes there is no limit on area so long as you are clearing pest plants but there is no definition of this. considers the clearance of non-pest plants being limited to 200m2 as a controlled activity under R17 is too low given earthwork are permitted up to 3000m2 .	
S254.019	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Oppose	Considers no discharge of sediment from earthworks is a physical impossibility and notes sediment is discharged off all natural landscapes during rain as a natural process. Notes that condition (v) requires the use of ESC devices to prevent a discharge but considers it is impossible to achieve this and the GWRC ESC guidelines do not stipulate this outcome.	Delete clause (g)
S254.020	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Oppose	Notes that for turbidity to be measured using a new method of Total Suspended Solids requires a laboratory test to measure and cannot readily be done in the field. Does not support the winter shutdown periods (Clause b) promoted through Policy 29. Considers it is entirely possible and reasonable to work into June or start in September after a dry winter and argues against preventing earthworks during these months. Notes such an approach has been in place for many years but does not work and unreasonably affects business operations.	The policy be deleted or amended to have more flexibility, and amend rule to refer to NTU standard.
S254.021	12 Schedules	Schedule 30: Financial Contributions.	Oppose	Does not support and considers an additional tax on land will contribute to housing unaffordability and that developers already pay development contributions to local authorities, and considers it unreasonable to collect the tax prior to consent being given effect to. Notes the schedule also requires the tax be based on the number of EHU's expected to be delivered	Delete the schedule

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				which is impossible if the application relates simply to earthworks. Concerns about who will be charged with calculating this and what happens if any future development delivers less than what was calculated.	
S254.022	13 Maps	Map 87: Unplanned greenfield areas - Wellington City Council.	Oppose	Objects to the ring fencing of Wellington City and requiring any other suitable areas in the City to go through a plan change with both GWRC (to amend the map) and WCC before being able to lodge a Resource consent. Considers the writers of the plan change have no awareness of development economics and what this Map, along with Policy P.15 and Rule P.R12, will do to land values and house prices.	This map and associated policy and rule be deleted.
S254.023	13 Maps	Map 97: Mangaroa catchment .	Oppose	Objects to the inclusion of this map as they consider it has far reaching implications and is based on a desktop assessment of what is probably LIDAR data and aerial photographs which is unreliable and unsuitable for a regional plan.	Delete the map

S053 Bob Curry

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S53.001	12 Schedules	Schedule 35: Small farm registration.	Amend	Considers that the winter stocking limits are arbitrary, and that the limitation of stock limits would affect their farming ventures, where existing stocking rates of 20-30 stock units per hectare have not had adverse effects on the land, groundwater, or adjacent waterways.	Limit the area of land requiring the submission of a Farm Plan to areas greater than 20 ha. Limit the stocking rate threshold for needing resource consent to 24 stock units per hectares of effective grazing areas on flat, fertile, productive land. Await the review of national policy statements before implementing changes to the Natural Resources Plan.
S53.002	General comments	General comments - current legislation	Oppose	Considers there is conflict and inconsistency between the implementation of the National Policy Statement - Highly Productive Land by Upper Hutt City Council and the implementation off the National Policy Statement on Freshwater Management by GWRC. Notes that government has indicated National Policy Statements will be reviewed to ensure land is available to meet population increase.	Await government Review of National Policy Statements before implementing Change 1 to the Natural Resources Plan.

S258 BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies

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S258.001	2 Interpretation	High risk industrial or trade premise	Oppose	Submitter not opposed to concept or intent of the definition of High Risk Industrial and Trade Premises, which is assumed to address the likes of the bulk fuel storage terminals at Seaview, Kaiwharawhara or Miramar. Notes uncertainty in definition that needs to be clarified to ensure broad category of 'petroleum or petrochemical industries' does not include service stations and/or other similar scale refuelling activities undertaken in compliance with the Environmental Guidelines for Water Discharges from Petroleum Industry Sites in New Zealand, Ministry for the Environment,	Amend definition of High Risk Industrial and Trade Premises to exclude service stations and truck stops with a complying interceptor. This could be achieved by making the following changes, or changes to the same effect: High risk industrial or trade premise An industrial or trade premise that stores, uses or generates contaminants or hazardous substances on-site that are exposed to rain and could become entrained in stormwater. Activities that may occur at these premises could include: • boat construction and maintenance • commercial cement, concrete or lime manufacturing or

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				December 1998 (MfE Guidelines for Water Discharges). Does not accept that these types of activities constitute 'high risk' industrial or trade premises. The MfE Guidelines for Water Discharges provides an effective regime for ensuring that stormwater discharges do not cause significant adverse effects on the environment. Those guidelines cover stormwater discharges from sites including: retail service stations, truck stops, terminals and depots and lubricating oil blending and grease manufacturing plants. Accepts that, a stormwater consent may be considered appropriate at bulk fuel storage terminals given a range of other operational discharges from such facilities that need to be considered and managed as part of the overall site management, and recognising stormwater management needs to be integrated into the regime. Such a matter is best dealt with through the consent process. Notes for service stations, truckstops and commercial refuelling facilities the risks are well understood and readily managed via compliance with the MfE Guideline for Water Discharges. A number of other jurisdictions effectively address this matter and recognise that service stations, truckstops and commercial refuelling facilities that comply with the MfE Guideline for Water Discharges do not represent a 'high risk'. For example: Environment Waikato has included a "deemed to comply" provision for discharges from service stations and truckstops complying with MfE Guideline for Water Discharges; Auckland Unitary Plan (operative in part) permits industrial and trade discharges listed as moderate risk activities (i.e. service stations are moderate if they comply with the MfE Guidelines as are truckstops (non-service station) having an activity area of less than	storage • chemical manufacture, formulation or bulk storage, recovery, processing or recycling • fertiliser manufacture or bulk storage • storage of hazardous wastes including waste dumps or dam tailings associated with mining activities • petroleum or petrochemical industries including a petroleum depot, terminal, blending plant or refinery, or facilities for recovery, reprocessing or recycling petroleum-based materials, **but excludes service stations, truck stops and refuelling facilities that comply with Ministry for the Environment 1998 Environmental Guidelines for Water Discharges from Petroleum Industry Sites in New Zealand.**

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				1,000m2); and Northland Regional Plan specifically excludes service stations, truck stops and refuelling facilities complying with MfE Water Discharge Guidelines from the definition of High Risk Industrial or Trade Premises and provides for such facilities as a permitted activity. Considers service stations, truckstops or commercial refuelling facilities that comply with MfE Water Discharge Guidelines should be excluded from definition of high risk industrial and trade premises, and managed through stormwater provisions in a way that is commensurate to the level of risk.	
S258.002	2 Interpretation	Hydrological control	Support	Supports hydrological control definition	Retain definition of hydrological control.
S258.003	2 Interpretation	Impervious surfaces	Support	Supports impervious surfaces definition	Retain definition of impervious surfaces.
S258.004	2 Interpretation	Redevelopment	Amend	Supports exclusion of trenching and resurfacing associated with installation, maintenance or repair of underground infrastructure. Supports exclusion of minor maintenance or repairs to carparking areas, driveways and paving. Seeks exclusion for resurfacing that does not involve re-direction of existing stormwater flows or drainage networks, for minor works to pave surfaces that may not fall into one of the other categories of excluded activities, but which will not alter existing stormwater flows or volumes.	Amend the definition of 'redevelopment' to also exclude resurfacing that does not involve re-direction of existing stormwater flows or drainage networks, as follows: Redevelopment For the purpose of assessment of a proposal involving the redevelopment of an existing urbanised property (i.e. brownfield development, upgrades to existing roads etc.) in relation to stormwater effects, this includes the replacement, reconstruction or addition (new) of impervious surfaces. Excludes: • minor maintenance or repairs to roads, carparking areas, driveways and paving • installation, maintenance or repair of underground infrastructure or network utilities requiring trenching and resurfacing • activities that only involve the re-roofing of existing buildings; **and**

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					• resurfacing that does not involve re-direction of existing stormwater flows or drainage networks.
S258.005	6 Other methods	Method M43: Supporting the health of urban waterbodies.	Support	Supports Method M43	Retain method M43 as notified.
S258.006	8 Whaitua Te Whanganui-a-Tara	Policy WH.P1: Improvement of aquatic ecosystem health.	Support	Supports Policy WH.P1, particularly the recognition in clause (a), that reduction in contaminant loading will be a progressive process.	Retain Policy WH.P1 as notified.
S258.007	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Support	Supports Policy WH.P2, particularly Clause (b), which only encourages redevelopment activities to reduce contaminant load. Considers this recognises that in some cases, best practice measures may already be in place such that further reduction may not be practicable, or appropriate in context of nature and scale of the particular redevelopment activity. Supports the network scale approach taken to reduction in contaminant loads in Clause (d)	Retain Policy WH.P2 as notified.
S258.008	8 Whaitua Te Whanganui-a-Tara	Policy WH.P5: Localised adverse effects of point source discharge.	Support	Supports Policy WH.P5 as it appropriately recognises that adverse effects are to be considered beyond the zone of reasonable mixing	Retain Policy WH.P5 as notified.
S258.009	8 Whaitua Te	Policy WH.P6:	Amend	Concerns with Policy WH.P6. It is unclear in chapeau whether exclusion for	Delete Policy WH.P6.

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	Whanganui-a-Tara	Cumulative adverse effects of point source discharges.		stormwater networks is intended to apply in relation to network discharge consents or consents held by other parties (such as industrial or trade premises) for discharges to the receiving environment that are via the stormwater network. Notes Clause (b)(i) of the policy applies to all existing discharges and specifies that where target attribute states are met those discharges are only appropriate if the consent conditions include a defined programme of work for improving discharge quality. Considers this suggests all existing discharge consents will need to be reviewed to ensure such consent conditions exist. Submitter opposes any such review of existing stormwater and operational water discharge consents, particularly where target attribute states are met. Considers this unreasonable and inappropriate. Clause (c) relates to situations in which the target attribute states are not met and requires the conditions of existing consents to require a reduction of the adverse effects. Whilst an expectation for improvements in the quality of discharges is not necessarily opposed where the target attribute states are not met, the Fuel Companies have the same concern as in relation to Clause (b) in that there appears to be an expectation that all existing discharge consents will be reviewed and additional conditions required. That would be opposed. Considers policy be deleted due to uncertainty and inappropriateness.	
S258.010	8 Whaitua Te Whanganui-a-Tara	Policy WH.P7: Discharges to groundwater.	Support	Supports Policy WH.P7	Retain Policy WH.P7 as notified.
S258.011	8 Whaitua Te	Policy WH.P8:	Amend	Supports the intent of Policy WH.P8 but notes it does not address risk inherent in the handling of	Amend Policy WH.P8, as follows:

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	Whanganui-a-Tara	Avoiding discharges of specific products and waste.		hazardous substances and potential for an accidental spillage of such substances to occur. Considers policy should be amended to address accidental spillages. Avoidance of such discharges as a first priority is supported. Where some residual risk remains, considers additional management measures such as containment or treatment will be appropriate to ensure contaminants do not enter water bodies.	Policy WH.P8: Avoiding discharges of specific products and waste Avoid, **as a first priority,** discharges to freshwater and coastal water, including where this is via the stormwater network, of: (a) chemical cleaning products, paint, solvents, fuels and coolant, oil, wet cement products and drill cooling water, or (b) animal effluent from an animal effluent storage facility or from an area where animals are confined, or (c) untreated industrial or trade waste, or (d) untreated organic waste or leachate from storage of organic material.**Where there is a residual risk of a discharge of the substances listed in (a) to (d) above, including any accidental spillage, management measures are implemented to contain and/or treat the discharge to avoid or mitigate adverse effects on freshwater or coastal water.**
S258.012	8 Whaitua Te Whanganui-a-Tara	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Support	Supports Policy WH.P9	Retain Policy WH.P9 as notified.
S258.013	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	Support	Supports Policy WH.P10	Retain Policy WH.P10 as notified.

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S258.014	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Amend	Does not consider it appropriate or necessary to treat service stations, truck stops and commercial refuelling facilities that comply with the MfE discharge guidelines as 'high risk' industrial or trade premises. Considers approach to managing the discharge of stormwater from premises where there is risk of hazardous substances or contaminants becoming entrained in stormwater, as set out in Policy WH.P11 could be appropriately applied to service stations, truck stops and commercial refuelling facilities as well as high risk industrial and trade premises. Submitter anticipates there may be other facilities that involve the handling of contaminants or hazardous substances and do not clearly fall to be considered as 'high risk industrial or trade premises', which would benefit from additional clarity in policy framework.	Amend Policy WH.P11 to also apply to service stations, truck stops and commercial refuelling facilities that comply with the MfE discharge guidelines (and, which the Fuel Companies consider do not meet the definition of 'high risk industrial or trade premises). This could be achieved by including specific reference to MfE discharge compliant service stations, truck stops and commercial refuelling facilities, or alternatively to industrial or trade premises in general, as follows: Policy WH.P11: Discharges of contaminants in stormwater from **industrial or trade premises and** high risk industrial or trade premises The discharge of stormwater to water, including discharges via the stormwater network, from **an industrial or trade premise or** a high risk industrial or trade premise shall be managed by: (a) having procedures and equipment in place to contain any spillage of hazardous substances for storage or removal, and (b) avoiding contaminants or hazardous substances being entrained in stormwater and discharged to a surface water body or coastal water, including via the stormwater network, or where avoidance is not practicable, implementing good management practice to avoid or minimise adverse effects on the environment, including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and (c) installing an interceptor where there is a risk of petroleum hydrocarbons entering into the stormwater network, a surface water body or coastal water, and (d) avoiding or mitigating adverse effects of stormwater discharges on groundwater quality.
S258.015	8 Whaitua Te Whanganui-a-Tara	Policy WH.P12: Managing stormwater from a	Support	To the extent that Policy WH:P12 might apply to fuel facilities at airports or ports, the policy requirement to implement good management practices and apply measures such as secondary containment,	Retain Policy WH.P12 as notified.

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		port or airport.		treatment and management procedures can be supported.	
S258.016	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Support	Supports WH.P14	Retain Policy WH.P14 as notified.
S258.017	8 Whaitua Te Whanganui-a-Tara	Rule WH.R1: Point source discharges of specific contaminants - prohibited activity.	Oppose	Concerned with wording of the proposed rule and consider it may result in unintended outcomes. E.g., clause (iv) prohibits point source discharge of liquid fuels, except where treated by an interceptor system to contain no more than 15 mg/l TPH. Considers this potentially creates a requirement that all discharges from roads must be directed via an interceptor system for treatment, which would be a significant undertaking and is not expected to be the case. Notes it also creates uncertainty for emergency services in responding to emergency events, such as a road accident. While management practices will be in place around clean-ups and to inform any need to secure a site during event (e.g. to clear spilled fuel from an area to respond to a life-threatening situation), some such actions may be deemed prohibited under this rule. Concerns exception for discharges that are treated via an interceptor system also has potential unintended consequences of sanctioning intentional disposal of liquid fuels direct to an interceptor in reliance on the ability of the interceptor to treat contaminants. This would not be accepted practice at a Fuel Company site and is contrary to the principle of source control i.e. managing the risk of	Delete Rule WH.R1.

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				the discharge of contaminants in the first instance. Further, the listing of specific contaminants in the rule as prohibited discharges may have the unintended consequence of parties assuming that the discharge of other contaminants is not controlled. Refers to Section 15 of RMA and notes need for Rule WH.R1 is unclear, as the discharge of the listed contaminants is already restricted by the RMA and Council's already have the ability to take enforcement action if necessary. Those parties that illegally discharge the listed contaminants are unlikely to change their behaviour on the basis of a new prohibited activity rule. Considers rule unnecessary, may result in unintended and inappropriate outcomes and should be deleted.	
S258.018	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Amend	Considers Rule WH.R4 provides appropriate recognition of industry best practice and practicable measures for managing the risk of contaminants and hazardous substances becoming entrained in stormwater from existing high risk industrial or trade premises. Submitter does not consider service stations, truck stops and commercial refuelling facilities that comply with MfE water discharge guidelines constitute 'high risk' industrial or trade premises. Considers Rule WH.R4 could be appropriately applied to existing MfE Guideline compliant service stations, truck stops and commercial refuelling facilities. Suggests Rule WH.R4 be amended to apply also to existing service stations, truck stops and commercial refuelling facilities that comply with MfE water discharge guidelines as a result of the definition change of high risk industrial or trade premise. Notes there may be other industrial or trade facilities	Amend Rule WH.R4 to also apply to service stations, truck stops and commercial refuelling facilities that comply with the MfE discharge guidelines, and, which the Fuel Companies consider do not meet the definition of 'high risk industrial or trade premises. This could be achieved by including specific reference to MfE discharge compliant service stations, truck stops and commercial refuelling facilities, or alternatively to industrial or trade premises in general, as follows: Rule WH.R4: Stormwater from an existing **industrial or trade premise** and high risk industrial or trade premise - permitted activity The discharge of stormwater from an existing **industrial or trade premise, including a** high risk industrial or trade premise, that is not a port or airport, into water, or onto or into land where it may enter water, including via an existing local authority stormwater network, is a permitted activity, provided the following conditions are met: (a) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with

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				that involve the handling of contaminants or hazardous substances and which do not clearly fall to be considered as 'high risk industrial or trade premises', which would benefit from additional clarity in rules framework.	SLUR Category III land, and (b) the discharge does not contain wastewater, and (c) if the discharge is to land where it may enter groundwater, (i) the discharge cannot cause or exacerbate the flooding of any other property, and (ii) the discharge is not located within 20m of a bore used for water abstraction for potable supply or stock water, and (d) any contaminants stored or used on site, or hazardous substances, cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or (i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or (ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons, and (e) if the discharge is into a surface water body, coastal water or via an existing local authority stormwater network, the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and where the discharge is not via an existing local authority stormwater network the discharge shall also not: (f) cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (g) give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or

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					(ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life. Note For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to WH.R11
S258.019	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Does not consider service stations, truck stops and commercial refuelling facilities that comply with MfE discharge guidelines constitute 'high risk' industrial or trade premises. Considers it appropriate to provide a permitted activity pathway for stormwater discharges from new and redeveloped impervious surfaces at MfE guideline compliant service stations, truck stops and commercial refuelling facilities on the same basis as for other land uses.	Amend Rule WH.R5 as follows: [...] (f) the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and where the discharge is not via an existing or new local authority stormwater network: (vi) the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (vii) the discharge shall not give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or

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					(iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life.**and where the discharge is from a service station, truck stop or commercial refuelling facility any contaminants stored or used on site, or hazardous substances, cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or:** **(i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or** **(ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons.** Note: Where a property connects to a local authority stormwater network, additional connection requirements and authorisations may be required by the network utility operator. For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to WH.R11.
S258.020	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas -	Amend	Does not consider service stations, truck stops and commercial refuelling facilities that comply with MfE discharge guidelines constitute 'high risk' industrial or trade premises. Considers it appropriate to provide a permitted activity pathway for stormwater discharges from new and redevelopment impervious surfaces at MfE guideline compliant service stations, truck stops and commercial refuelling facilities on the same basis as for other land uses. Supports Rule WH.R7, particularly the approach of treating the ability to achieve the target load	Amend Rule WH.R5 to provide for stormwater discharges from new and redeveloped impervious surfaces at MfE guideline compliant service stations, truck stops and commercial refuelling facilities on the same basis as for other land uses. This could be achieved by making the following changes or changes to the same effect: Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity The use of land for the creation of new and/or redevelopment of impervious surfaces of an existing urbanised property and the associated discharge of

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		controlled activity.		reductions for copper and zinc, as set out in Schedule 28 through best practicable option measures as a 'matter of control' rather than as a prerequisite condition for new or redeveloped impervious surfaces to be able to be treated as a controlled activity under Rule WH.R7.	stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not a high risk industrial or trade premise, is a controlled activity, provided the following conditions are met: (a) the proposal involves the creation of new, or redevelopment of impervious surfaces of between 1,000m2 and 3,000m2 (baseline property existing impervious area as at 30 October 2023) or, (b) the proposal involves the creation of new, or redevelopment of impervious areas of less than 1,000m2 but is not permitted under the conditions of Rule WH.R5, and, (c) where stormwater directly or indirectly (through an existing local authority stormwater network) discharges to a river, hydrological control is provided either: (i) on-site, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has been sized to accommodate the proposed stormwater discharges, and (d) contaminant treatment of stormwater is provided either: (i) on-site through a stormwater treatment system, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater treatment system that has capacity to treat contaminant loads from the site; **and** **(e) where the discharge is from a service station, truck stop or commercial refuelling facility any contaminants stored or used on site, or hazardous substances, cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or:** **(i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or** **(ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the**

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					treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons.
S258.021	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Support	Considers the discretionary activity status set by Rule WH.R11 for discharge of stormwater from new and redevelopment impervious surfaces at high risk trade and industrial sites, or for other sites where compliance with Rules WH.R5, WH.R6 or WH.R7 is not achieved, is accepted, subject to amendments sought to wording of Schedule 28 to clearly provide for source control and/or contaminant management measures as a means of addressing target load reductions for copper and zinc.	Retain Rule WH.R11 as notified.
S258.022	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Amend	Submitter understands activities not meeting the target load reductions for copper and zinc, as set out in Schedule 28, will default from discretionary under Rule WH.R11 to a non-complying activity status under Rule WH.R12. Submitter is not opposed provided amendments sought to the wording of Schedule 28 are made to clearly provide for source control and/or contaminant management measures as a means of addressing the target load reductions for copper and zinc.	Retain Rule WH.R12 as notified.
S258.023	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	Clause (c)(iv) sets a zero tolerance approach to any sediment content in stormwater runoff during earthworks. The requirement to entirely prevent silt or sediment from entering the stormwater system is considered too absolute and unlikely to be able to be achieved in all situations even where best practice silt and sediment control measures are in place. This approach is likely to generate high consenting costs that are not reflective of the level of potential contaminants generated by small-scale earthworks that are well managed in accordance with best practice erosion and sediment control measures, or the additional benefits, in terms of sediment reduction, that might be achieved by	Amend Rule WH.23(c)(iv) to focus on implementation of best practice erosion and sediment control measures rather than the absolute avoidance approach currently proposed. This could be achieved by making the following changes or changes to the same effect: Rule WH.R23: Earthworks - permitted activity Earthworks is a permitted activity, provided the following conditions are met: a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or b) the earthworks are to implement an action in the farm environment plan for the farm, or

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				requiring a consent to be obtained. Suggests a more appropriate approach is considered to be to require implementation of best practice erosion and sediment control measures to reduce the risk of sediment becoming entrained in stormwater.	c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (i) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (ii) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (iii) the area of earthworks must be stabilised within six months after completion of the earthworks, and (iv) **best practice erosion and sediment control measures shall be used to minimise the risk of a discharge** ~~there is no discharge~~ of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (v) **best practice** erosion and sediment control measures shall be used to **minimise the risk of** ~~prevent~~ a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).
S258.024	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	Notes Rule WH.R24 requires a concentration of no more than 100mg/L of total suspended solids (TSS) in discharges from earthworks, with a default to non-complying activity status (under Rule WH.25) where that threshold cannot be achieved. Considers a broad range of variables will affect sediment loading in discharges from earthworks including soil types, slope length and angle, rain events and intensity during an earthworks project, as well as the nature scale and duration of the earthworks involved. The ability to achieve and clearly demonstrate the	Amend Rule WH.R24, to focus on implementation of best practice erosion and sediment control measures rather requiring compliance with a sediment loading threshold. This could be achieved by making the following changes or changes to the same effect: Rule WH.R24: Earthworks - restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary

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				ability to comply with a specified TSS threshold may not be known prior to the commencement of any given earthworks project. Consider a more practicable approach would to be to require implementation of best practice erosion and sediment control measures to reduce the risk of sediment becoming entrained in stormwater as part of a restricted discretionary activity consenting process under WH.R24. Considers there is unlikely to be any significant benefit in requiring a non-complying activity consent, rather than a restricted discretionary activity consent, where there is uncertainty around the ability to comply with the specified 100mg/L TSS threshold at all times (for example where an intense rainfall event may occur), and there is an ability for council to review, impose conditions and monitor proposed erosion and sediment control measures through the RD consent process in any case.	activity, provided the following conditions are met: (a) ~~best practice erosion and sediment control measures shall be used to minimise the risk of a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.~~ ~~the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than:~~ ~~(iii) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or~~ ~~(iv) 30% in any other river, and~~ (b) earthworks shall not occur between 1st June and 30th September in any year.
S258.025	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Support	Supports Rule WH.R25, subject to the changes sought to Rule WH.R24.	Retain Rule WH.R2 as notified.
S258.026	8 Whaitua Te Whanganui-a-Tara	Rule WH.R33: Take and use of water in the Whaitua Te Whanganui-a Tara - restricted discretionary activity.	Amend	Supports exclusion of dewatering activities undertaken in accordance with R159 from WH.R33. R160 makes specific provision for dewatering activities that do not meet the permitted activity standards set by R159. Suggests dewatering undertaken in accordance with R160 should also be excluded from Rule W:R33	Amend Rule WH.R33 to exclude groundwater takes associated with dewatering activities undertaken in accordance with R160. This could be achieved by making the following changes: Rule WH.R33: Take and use of water in the Whaitua Te Whanganui-a Tara - restricted discretionary activity The take and use of water from any river (including tributaries) and groundwater in the Te Awa Kairangi/Hutt River, Wainuiomata River and Ōrongorongo River catchments, that is not provided for in Rules R152, R153, R154, R155, R156, R157, ~~or~~ R159 **or R160** is a restricted discretionary activity provided the following conditions are

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					met: ...
S258.027	8 Whaitua Te Whanganui-a-Tara	Rule WH.R34: Take and use of water in the Whaitua Te Whanganui-a-Tara - discretionary activity.	Amend	Supports exclusion of dewatering activities undertaken in accordance with R159 from WH.R34. R160 makes specific provision for dewatering activities that do not meet the permitted activity standards set by R159. Suggests dewatering undertaken in accordance with R160 should also be excluded from Rule W:R34	Amend Rule WH.R34 to exclude groundwater takes associated with dewatering activities undertaken in accordance with R160. This could be achieved by making the following changes: Rule WH.R34: Take and use of water in the Wellington Harbour and Hutt Valley Whaitua Te Whanganui-a-Tara - discretionary activity The take and use of water that is not provided for in Rules R152, R153, R154, R155, R156, R157, ~~or~~ R159 **or R160** in the Wellington Harbour and Hutt Valley Whaitua Te Whanganui-a Tara: ...
S258.028	9 Te Awarua-o-Porirua Whaitua	Policy P.P1: Improvement of aquatic ecosystem health.	Support	Supports Policy P.P1	Retain Policy P.P1 as notified.
S258.029	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Support	Supports Policy P.P2	Retain Policy P.P2 as notified.
S258.030	9 Te Awarua-o-Porirua Whaitua	Policy P.P5: Localised adverse effects of	Support	Supports Policy P.P5	Retain Policy P.P5 as notified

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		point source discharges .			
S258.031	9 Te Awarua-o-Porirua Whaitua	Policy P.P6: Point source discharges .	Oppose	Concerns with Policy P.P6. It is unclear in chapeau whether exclusion for stormwater networks is intended to apply in relation to network discharge consents or consents held by other parties (such as industrial or trade premises) for discharges to the receiving environment that are via the stormwater network. Notes Clause (b)(i) of the policy applies to all existing discharges and specifies that where target attribute states are met those discharges are only appropriate if the consent conditions include a defined programme of work for improving discharge quality. Considers this suggests all existing discharge consents will need to be reviewed to ensure such consent conditions exist. Submitter opposes any such review of existing stormwater and operational water discharge consents, particularly where target attribute states are met. Considers this unreasonable and inappropriate. Clause (c) relates to situations in which the target attribute states are not met and requires the conditions of existing consents to require a reduction of the adverse effects. Whilst an expectation for improvements in the quality of discharges is not necessarily opposed where the target attribute states are not met, the Fuel Companies have the same concern as in relation to Clause (b) in that there appears to be an expectation that all existing discharge consents will be reviewed and additional conditions required. That would be opposed. Considers policy be deleted due to uncertainty and inappropriateness.	Delete Policy P.P6.
S258.032	9 Te Awarua-	Policy P.P7	Support	Supports Policy P.P7	Retain Policy P.P7as notified.

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	o-Porirua Whaitua	Discharges to groundwater.			
S258.033	9 Te Awarua-o-Porirua Whaitua	Policy P.P8 Avoiding discharges of specific products and waste.	Amend	Supports the intent of Policy P.P8 is supported but notes it does not address risk inherent in the handling of hazardous substances and potential for an accidental spillage of such substances to occur. Considers policy should be amended to address accidental spillages. Avoidance of such discharges as a first priority is supported. Where some residual risk remains, considers additional management measures such as containment or treatment will be appropriate to ensure contaminants do not enter water bodies.	Amend Policy P.P8, as follows: Policy P.P8: Avoiding discharges of specific products and waste Avoid, **as a first priority,** discharges to freshwater and coastal water, including where this is via the stormwater network, of: (e) chemical cleaning products, paint, solvents, fuels and coolant, oil, wet cement products and drill cooling water, or (f) animal effluent from an animal effluent storage facility or from an area where animals are confined, or (g) untreated industrial or trade waste, or (h) untreated organic waste or leachate from storage of organic material.**Where there is a residual risk of a discharge of the substances listed in (a) to (d) above, including any accidental spillage, management measures are implemented to contain and/or treat the discharge to avoid or mitigate adverse effects on freshwater or coastal water.**
S258.034	9 Te Awarua-o-Porirua Whaitua	Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Support	Supports Policy P.9	Retain Policy P.P9 as notified.
S258.035	9 Te Awarua-	Policy P.P10: Managing	Support	Supports Policy P.10	Retain Policy P.P10 as notified.

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	o-Porirua Whaitua	adverse effects of stormwater discharges.			
S258.036	9 Te Awarua-o-Porirua Whaitua	Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises.	Amend	Does not consider it appropriate or necessary to treat service stations, truck stops and commercial refuelling facilities that comply with the MfE discharge guidelines as 'high risk' industrial or trade premises. Considers approach to managing the discharge of stormwater from premises where there is risk of hazardous substances or contaminants becoming entrained in stormwater, as set out in Policy P.P11 could be appropriately applied to service stations, truck stops and commercial refuelling facilities as well as high risk industrial and trade premises. Submitter anticipates there may be other facilities that involve the handling of contaminants or hazardous substances and do not clearly fall to be considered as 'high risk industrial or trade premises', which would benefit from additional clarity in policy framework.	Amend Policy P.P11 to also apply to service stations, truck stops and commercial refuelling facilities that comply with the MfE discharge guidelines (and, which the Fuel Companies consider do not meet the definition of 'high risk industrial or trade premises). This could be achieved by including specific reference to MfE discharge compliant service stations, truck stops and commercial refuelling facilities, or alternatively to industrial or trade premises in general, as follows: Policy P.P11: Discharges of contaminants in stormwater from **industrial or trade premises and** high risk industrial or trade premises The discharge of stormwater to water, including discharges via the stormwater network, from **an industrial or trade premise or** a high risk industrial or trade premise shall be managed by: (a) having procedures and equipment in place to contain any spillage of hazardous substances for storage or removal, and (b) avoiding contaminants or hazardous substances being entrained in stormwater and discharged to a surface water body or coastal water, including via the stormwater network, or where avoidance is not practicable, implementing good management practice to avoid or minimise adverse effects on the environment, including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and (c) installing an interceptor where there is a risk of petroleum hydrocarbons entering into the stormwater network, a

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					surface water body or coastal water, and (d) avoiding or mitigating adverse effects of stormwater discharges on groundwater quality.
S258.037	9 Te Awarua-o-Porirua Whaitua	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Support	Supports P.P13	Retain Policy P.P13 as notified.
S258.038	9 Te Awarua-o-Porirua Whaitua	Rule P.R1: Point source discharges of specific contaminants - prohibited activity.	Oppose	Concerned with wording of the proposed rule and consider it may result in unintended outcomes. E.g., clause (iv) prohibits point source discharge of liquid fuels, except where treated by an interceptor system to contain no more than 15 mg/l TPH. Considers this potentially creates a requirement that all discharges from roads must be directed via an interceptor system for treatment, which would be a significant undertaking and is not expected to be the case. Notes it also creates uncertainty for emergency services in responding to emergency events, such as a road accident. While management practices will be in place around clean-ups and to inform any need to secure a site during event (e.g. to clear spilled fuel from an area to respond to a life-threatening situation), some such actions may be deemed prohibited under this rule. Concerns exception for discharges that are treated via an interceptor system also has potential unintended consequences of sanctioning intentional disposal of liquid fuels direct to an interceptor in reliance on the ability of the interceptor to treat contaminants. This would not be accepted practice at a Fuel Company site and is contrary to the	Delete Rule P.R1.

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				principle of source control i.e. managing the risk of the discharge of contaminants in the first instance. Further, the listing of specific contaminants in the rule as prohibited discharges may have the unintended consequence of parties assuming that the discharge of other contaminants is not controlled. Refers to Section 15 of RMA and notes need for Rule WH.R1 is unclear, as the discharge of the listed contaminants is already restricted by the RMA and Council's already have the ability to take enforcement action if necessary. Those parties that illegally discharge the listed contaminants are unlikely to change their behaviour on the basis of a new prohibited activity rule. Considers rule unnecessary, may result in unintended and inappropriate outcomes and should be deleted.	
S258.039	9 Te Awarua-o-Porirua Whaitua	Rule P.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Amend	Considers Rule P.R4 provides appropriate recognition of industry best practice and practicable measures for managing the risk of contaminants and hazardous substances becoming entrained in stormwater from existing high risk industrial or trade premises. Submitter does not consider service stations, truck stops and commercial refuelling facilities that comply with MfE water discharge guidelines constitute 'high risk' industrial or trade premises. Considers Rule P.R4 could be appropriately applied to existing MfE Guideline compliant service stations, truck stops and commercial refuelling facilities. Considers Rule P.R4 be amended to apply also to existing service stations, truck stops and commercial refuelling facilities that comply with MfE water discharge guidelines as a result of the definition change of high risk industrial or trade premise. Notes there may be other industrial or trade facilities	Amend Rule P.R4 to also apply to service stations, truck stops and commercial refuelling facilities that comply with the MfE discharge guidelines, and, which the Fuel Companies consider do not meet the definition of 'high risk industrial or trade premises. This could be achieved by including specific reference to MfE discharge compliant service stations, truck stops and commercial refuelling facilities, or alternatively to industrial or trade premises in general, as follows: Rule P.R4: Stormwater from an existing **industrial or trade premise and** high risk industrial or trade premise - permitted activity The discharge of stormwater from an existing **industrial or trade premise, including a** high risk industrial or trade premise, that is not a port or airport, into water, or onto or into land where it may enter water, including via an existing local authority stormwater network, is a permitted activity, provided the following conditions are met: (a) the discharge is not from, onto or into SLUR Category III

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				that involve the handling of contaminants or hazardous substances and which do not clearly fall to be considered as 'high risk industrial or trade premises', which would benefit from additional clarity in rules framework.	land, unless the stormwater does not come into contact with SLUR Category III land, and (b) the discharge does not contain wastewater, and (c) if the discharge is to land where it may enter groundwater, (i) the discharge cannot cause or exacerbate the flooding of any other property, and (ii) the discharge is not located within 20m of a bore used for water abstraction for potable supply or stock water, and (d) any contaminants stored or used on site, or hazardous substances, cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or (i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or (ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons, and (e) if the discharge is into a surface water body, coastal water or via an existing local authority stormwater network, the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and where the discharge is not via an existing local authority stormwater network the discharge shall also not: (f) cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (g) give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films,

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					scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life. Note For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to P.R10
S258.040	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Does not consider service stations, truck stops and commercial refuelling facilities that comply with MfE discharge guidelines constitute 'high risk' industrial or trade premises. Considers it appropriate to provide a permitted activity pathway for stormwater discharges from new and redeveloped impervious surfaces at MfE guideline compliant service stations, truck stops and commercial refuelling facilities on the same basis as for other land uses.	Amend Rule P.R5 as follows: [..] (g) the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (h) the discharge shall not give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life.**and where the discharge is from a service station, truck stop or commercial refuelling facility any contaminants stored or used on site, or hazardous substances, cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network,**

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					or: **(a) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or** **(b) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons.** Note: Where a property connects to a local authority stormwater network, additional connection requirements and authorisations may be required by the network utility operator. For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to P.R10.
S258.041	9 Te Awarua-o-Porirua Whaitua	Rule P.R31: Take and use of water - restricted discretionary activity.	Amend	Does not consider service stations, truck stops and commercial refuelling facilities that comply with MfE discharge guidelines constitute 'high risk' industrial or trade premises. Considers it appropriate to provide a permitted activity pathway for stormwater discharges from new and redeveloped impervious surfaces at MfE guideline compliant service stations, truck stops and commercial refuelling facilities on the same basis as for other land uses. Supports Rule P.R7, particularly the approach of treating the ability to achieve the target load reductions for copper and zinc, as set out in Schedule 28, through best practicable option measures as a 'matter of control' rather than as a prerequisite condition for new or redeveloped impervious surfaces to be able to be treated as a controlled activity under Rule P.R7.	Amend Rule to provide for stormwater discharges from new and redeveloped impervious surfaces at MfE guideline compliant service stations, truck stops and commercial refuelling facilities on the same basis as for other land uses. This could be achieve basis as for other land uses. This could be achieved by making the following changes or changes to the same effect: Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity The use of land for the creation of new and/or redevelopment of impervious surfaces of an existing urbanised property and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not a high risk industrial or trade premise, is a controlled activity, provided the following conditions are met: (a) the proposal involves the creation of new, or redevelopment of impervious surfaces of between 1,000m2

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					and 3,000m2 (baseline property existing impervious area as at 30 October 2023) or, (b) the proposal involves the creation of new, or redevelopment of impervious areas of less than 1,000m2 but is not permitted under the conditions of Rule WH.R5, and, (c) where stormwater directly or indirectly (through an existing local authority stormwater network) discharges to a river, hydrological control is provided either: (iii) on-site, or (iv) off-site through an existing local authority stormwater network or privately owned stormwater network that has been sized to accommodate the proposed stormwater discharges, and (d) contaminant treatment of stormwater is provided either: (iii) on-site through a stormwater treatment system, or (iv) off-site through an existing local authority stormwater network or privately owned stormwater treatment system that has capacity to treat contaminant loads from the site; and**(e) where the discharge is from a service station, truck stop or commercial refuelling facility any contaminants stored or used on site, or hazardous substances, cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or:** **(iii) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or** **(iv) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons.**
S258.042	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redevelop	Support	Considers the discretionary activity status set by Rule WH.P10 for discharge of stormwater from new and redevelopment impervious surfaces at high risk trade and industrial sites, or for other sites where compliance with Rules P.R5, P.R6 or P.R7 is not achieved, is accepted, subject to amendments	Retain Rule P.R10 as notified.

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		ed impervious surfaces-discretionary activity.		sought to wording of Schedule 28 to clearly provide for source control and/or contaminant management measures as a means of addressing target load reductions for copper and zinc.	
S258.043	9 Te Awarua-o-Porirua Whaitua	Rule P.R11: All other stormwater discharges - non-complying activity.	Amend	Submitter understands activities not meeting the target load reductions for copper and zinc, as set out in Schedule 28, will default from discretionary under Rule P.R10 to a non-complying activity status under Rule P.R11. Submitter is not opposed provided amendments sought below to the wording of Schedule 28 are made to clearly provide for source control and/or contaminant management measures as a means of addressing the target load reductions for copper and zinc.	Retain Rule P.R11 as notified.
S258.044	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Amend	Clause (c)(iv) sets a zero tolerance approach to any sediment content in stormwater runoff during earthworks. The requirement to entirely prevent silt or sediment from entering the stormwater system is considered too absolute and unlikely to be able to be achieved in all situations even where best practice silt and sediment control measures are in place. This approach is likely to generate high consenting costs that are not reflective of the level of potential contaminants generated by small-scale earthworks that are well managed in accordance with best practice erosion and sediment control measures, or the additional benefits, in terms of sediment reduction, that might be achieved by requiring a consent to be obtained. Suggests a more appropriate approach is to require implementation of best practice erosion and sediment control measures to reduce the risk of sediment becoming entrained in stormwater.	Amend Rule P.22(c)(iv) and (v) to focus on implementation of best practice erosion and sediment control measures rather than the absolute avoidance approach currently proposed. This could be achieved by making the following changes or changes to the same effect: Rule P.R22: Earthworks - permitted activity Earthworks is a permitted activity, provided the following conditions are met: a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or b) the earthworks are to implement an action in the farm environment plan for the farm, or c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (i) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (ii) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and

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					(iii) the area of earthworks must be stabilised within six months after completion of the earthworks, and (iv) **best practice erosion and sediment control measures shall be used to minimise the risk of a discharge** ~~there is no discharge~~ of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (v) **best practice** erosion and sediment control measures shall be used to **minimise the risk of** ~~prevent~~ a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).
S258.045	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Amend	Notes Rule WH.R24 requires a concentration of no more than 100mg/l of total suspended solids (TSS) in discharges from earthworks, with a default to non-complying activity status (under Rule WH.25) where that threshold cannot be achieved. Considers a broad range of variables will affect sediment loading in discharges from earthworks including soil types, slope length and angle, rain events and intensity during an earthworks project, as well as the nature scale and duration of the earthworks involved. The ability to achieve and clearly demonstrate the ability to comply with a specified TSS threshold may not be known prior to the commencement of any given earthworks project. Suggests a more practicable approach would to be to require implementation of best practice erosion and sediment control measures to reduce the risk of sediment becoming entrained in stormwater as part of a restricted discretionary activity consenting process under WH.R24.	Amend Rule P.R23, to focus on implementation of best practice erosion and sediment control measures rather requiring compliance with a sediment loading threshold. This could be achieved by making the following changes or changes to the same effect: Rule P.R23: Earthworks - restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule P.R22 is a restricted discretionary activity, provided the following conditions are met: (a) **best practice erosion and sediment control measures shall be used to minimise the risk of a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.** ~~the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the~~

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				Considers there is unlikely to be any significant benefit in requiring a non-complying activity consent, rather than a restricted discretionary activity consent, where there is uncertainty around the ability to comply with the specified 100mg/l TSS threshold at all times (for example where an intense rainfall event may occur), and there is an ability for council to review, impose conditions and monitor proposed erosion and sediment control measures through the RD consent process in any case.	~~discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than:~~ ~~(iii) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or~~ ~~(iv) 30% in any other river, and~~ (c) earthworks shall not occur between 1st June and 30th September in any year.
S258.046	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks - non-complying activity.	Support	Supports Rule P.R24, subject to the changes sought to Rule P.R23	Retain Rule P.R24 as notified.
S258.047	9 Te Awarua-o-Porirua Whaitua	Rule P.R30: Take and use of water - permitted activity.	Support	Supports exclusion of dewatering activities undertaken in accordance with R159 or R160.	Retain Rule P.R31 as notified.
S258.048	9 Te Awarua-o-Porirua Whaitua	Rule P.R31: Take and use of water - restricted discretionary activity.	Support	Supports exclusion of dewatering activities undertaken in accordance with R159 or R160.	Retain Rule P.R32 as notified.
S258.049	12 Schedules	Schedule 28: Stormwater Contamina	Amend	Considers focus of Schedule 28 is on stormwater contaminant treatment without recognising role of source control and/or other contaminant management measures to reduce copper and zinc loading in stormwater discharges. Considers this does not reflect the approach set out	Amend Schedule 28 to clearly enable source consent and/or other contaminant management measures to be used as an alternative means of achieving the target load reductions; and make all necessary amendments to clarify the assessment pathway (including the applicable rules) for activities that cannot achieve the copper and zinc target load

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		nt Treatment.		in proposed policy framework, which clearly recognises and encourages use of source control. As per MfE Water Discharge Guidelines, a comprehensive approach is taken to management of stormwater runoff from the Fuel Companies' facilities and managing risk of contaminants becoming entrained in stormwater discharges including source control, site management and emergency response procedures as well as use of treatment devices suited to industry and anticipated contaminant types and loads. Opposes an approach that favoured the treatment of stormwater runoff through raingardens/bioretention at expense of other proven stormwater contaminant management methods. Schedule 28 should be amended to ensure consistency with the policy direction. In addition, under Rule WH.R11, an application for resource consent must include a Stormwater Impact Assessment prepared in accordance with Schedule 29. Clause 6 of Schedule 29 provides a clear reference to the contaminant treatment approach in Schedule 28. However, a statement at beginning of Schedule 28 specifies that Schedule 28 relates to Rules WH.R6, WH.R7, P.R6 and P.R7. No reference is made, however, to WH.R11, which creates the potential for confusion as to the extent to which target load reductions for copper and zinc apply to activities seeking resource consent under Rule WH.R11, and whether an inability to achieve the target load reductions specified in Schedule 28 will result in non-compliance with Rule WH.R11, such that the activity would default to non-complying under Rule WH.R12. Considers this assessment pathway needs to be clarified.	reductions. This could be achieved by making the following changes or changes to the same effect: Schedule 28: Stormwater Contaminant Treatment This schedule relates to Rules WH.R6, WH.R7, **WH.R11,** P.R6, ~~and~~ P.R7 and **P.R10.** Target Load Reductions All new and redeveloped impervious surfaces are to be treated to meet an equivalent target load reduction for copper and zinc to those set out for a raingarden/bioretention device, as per Table 1. Table 1: Target Load Reductions for Copper and Zinc, Bioretention (rain garden) - Copper 90% - Zinc 90% Equivalent Target Load Reduction A treatment train approach, **source control and/or contaminant management** may be used to achieve an Equivalent Target Load Reduction set out in Table 1. The equation below provides an example of how the total load reduction factor of a given treatment chain can be calculated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S258.050	12 Schedules	Schedule 29: Stormwater Impact Assessments.	Amend	Supports Schedule 29, particularly the additional assessment matters applying to high risk industrial or trade premises are considered to be appropriate. With regards to the changes sought to the definition of 'high risk industrial or trade premises', submitter considers these additional clauses could be appropriately applied to any new or redevelopment impervious surfaces at service stations, truck stops or commercial refuelling facilities that are not otherwise provided for as a permitted activity under Rule WH.R5 or P.R5 or a restricted discretionary activity under Rule WH.R7 or P.R7.	Amend Schedule 29 to clarify it's application to service station, truck stop and commercial refuelling activities that the Fuel Companies seek be excluded from the definition of 'high risk' trade and industrial activities. This could be achieved by making the following changes or changes to the same effect: Schedule 29: Stormwater Impact Assessments A stormwater impact assessment shall include the following analysis: ... Where the application includes **an industrial or trade premise or** a high risk industrial or trade premise the stormwater impact assessment analysis must also consider the following: i. Procedures and equipment in place to contain any spillage of hazardous substances for storage or removal, to ensure these are not entrained in stormwater, and ii. Management practices proposed to avoid or minimise entrainment of contaminants into stormwater, including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring.

S092 Callum Forbes

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S92.001	General comments	General comments - overall	Oppose	Expressed concern with lack of consultation with rural communities. Supports submissions made by Mangaroa and Akatarawa residents.	Withdraw PC1 in full
S92.002	General comments	General comments - current legislation	Oppose	Questions the legality of the process undertaken by GWRC, citing recent Environment Court decisions.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S92.003	General comments	General comments - current legislation	Oppose	Considers that PC1 imposes unfair sanctions on property owners.	Delete provisions where there are insufficient monitoring sites.
S92.004	General comments	General comments - water bodies	Oppose	Expressed concern that the minimum size for "small rivers" is not defined.	Amend definitions which relate to other regulations
S92.005	12 Schedules	Schedule 35: Small farm registration.	Oppose	Does not support the prescribed data collection requirements, on the basis that it is too complex for laypeople to record, and that systems to receive the data have not yet been established. Refers to the examples of Rules R106 and R107; considers that Rule R106 would require resource consent for the clearance of any tree for firewood as a renewable energy activity; and Rule R107 would require resource consent for earthworks for the burying of deceased livestock.	Delete the requirement for farms of 4 ha to register with GWRC. Implement systems that are necessary to promulgate regulations. Confirm if GWRC staff have the authority to deviate from the regulations as drafted.

S233 Calum Bradbury

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S233.001	General comments	General comments - overall	Not Stated	Submitter values the water quality values of the following areas for contact recreation and ecosystem health: i. Te Awakairangi / the Hutt River ii. Akatarawa River iii. Whakatikei River iv. Titahi Bay v. Lyall Bay vi. Otaki River Considers the natural form and character of these waterbodies is an important part of their value. Natural form and character creates rapids and other features of these sections of river that make them	Requests the outstanding value of the Hutt Gorge section [Te Awakairangi / the Hutt Gorge] of river recognised in the plan.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				valuable for kayaking. Te Awakairangi / the Hutt Gorge is an outstanding run for whitewater kayaking, which traverses what they consider an outstanding landscape with outstanding amenity values. Would like to see the outstanding value of this section of river recognised in the plan. The natural and wildlife values of these areas are also important to submitter.	
S233.002	General comments	General comments - freshwater	Not Stated	Concerned about increased amounts of sediment coming from the Pakuratahi River when flows increase and potential e.coli and pathogen loads in the water. Observes algae in summer months when flows are low resulting in issues with recreation and amenity as well as human health when making contact with water. Concerns river engineering such as railway iron degrades water quality and creates potential hazards for river users when slash and logs get caught on structures	Not stated
S233.003	General comments	General comments - overall	Support	Supports PC1 and the initiatives to introduce to improve water quality in the catchment.	Requests that GWRC initiatives are carried through to the operative plan, particularly where they protect and restore ecosystem health, contact recreation values, natural form and character, and amenity.
S233.004	General comments	General comments - water quality improvements	Support	Supports targets in the water quality target tables.	Requests as much work as possible is done through environmental limits to achieve water quality targets.
S233.005	General comments	General comments	Support	Supports the concept of Te Mana o te Wai and the hierarchy of obligations.	Prioritise ecosystem health and contact recreation prioritised.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		- freshwater			
S233.006	General comments	General comments - water quality improvements	Not Stated	Key concerns are water quality (particularly e. coli, sediment, algal growth/periphyton, and ecosystem health); amenity; contact recreation; and natural form and character.	Seeks the following: Recognition in the plan of the outstanding kayaking / packrafting / rafting values in the Whaitua are recognised in the plan, particularly for the Hutt Gorge (which has outstanding kayaking, amenity, and landscape values). More work by GWRC to monitor and preserve natural character, and to strengthen objectives, policies, and rules which allow the river to function more naturally, particularly in its reaches influenced by flood protection. Targets for natural character that are similar to the sorts of targets set for water quality and seeks objectives and policies that support these. More work to enhance water quality in the coastal environment, for use of 'flat water' environments to learn and train without worrying about compromising health if contact is made with the water. Retain coastal water quality indicators/targets.

S260 Cannon Point Development Limited (Ltd.)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S260.001	General comments	General comments - overall	Support	Supports PC1 objectives but considers the objectives do not warrant the subsequent policies and rules that prohibit unplanned greenfield development and associated stormwater discharges. Concerned this prohibition would foreclose any opportunity to manage adverse effects to achieve Target Attribute States and coastal water objectives where this is possible.	~~Not stated.~~ Delete the definition of Unplanned greenfield development and delete Maps 86-89 Greenfield Areas (planned and unplanned). Or alternatively amend Map 88 to include the site extent of Cannon Point, as shown on the map included in Appendix A, and further described in paragraph 1.12, of submission as a Planned/ existing urban area, and make consequential amendments to subsequent PC1 provisions, to reflect the above.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Suggests an effects management approach would better allow for the competing directives of the NPS-FW and NPS-UD to be resolved.	
S260.002	General comments	General comments - unplanned greenfield development	Oppose	Opposes the identification of unplanned greenfield areas in PC1 maps and the unplanned greenfield development definition. Considers this development activity should be controlled by the relevant zone rules in the District Plan. Concerned the inclusion of the Rural Lifestyle zone as Unplanned Greenfield Area under PC1 is inconsistent with the inclusion of other similar zones as planned development across other local authorities, in particular Large Lot Residential in Wellington City Council and Hill Residential in Hut City Council. Considers residential development in this zone is considered to be planned development and should be defined as such in PC1. Considers the approach is fundamentally flawed from a resource management perspective, and contrary to the Upper Hut District Plan. Considers defining unplanned greenfield areas as those that do not have an urban or future urban zone as of 30th October 2023 is inflexible and unreasonable because the date does not allow for notified plan changes which are already processing that propose to re-zone land for residential use beyond that date. Notes in the recommendations to the Joint Committee Subcommittee for the draft Wairarapa-Wellington-Horowhenua Future Development Strategy (FDS), GW support the submitters site as a growth area. Considers the definition and approach to what is unplanned urban development is flawed and needs to be reconsidered consistently across each district council.	~~Not stated.~~ Delete the definition of Unplanned greenfield development and delete Maps 86-89 Greenfield Areas (planned and unplanned). Or alternatively amend Map 88 to include the site extent of Cannon Point, as shown on the map included in Appendix A, and further described in paragraph 1.12, of submission as a Planned/ existing urban area, and make consequential amendments to subsequent PC1 provisions, to reflect the above.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S260.003	2 Interpretation	Unplanned greenfield development	Oppose	Considers the unplanned greenfield areas identified in PC1 maps and the consequential definition is not justified in PC1 . Considers this development activity should be controlled by the relevant zone rules in the District Plan. Considers the inclusion of the Rural Lifestyle zone under the Upper Hutt District Plan, as Unplanned Greenfield Area under PC1 is inconsistent with the inclusion of other similar zones as planned development across other local authorities, in particular; Large Lot Residential in Wellington City Council and Hill Residential in Hut City Council. Notes the Rural Lifestyle Zone provides for detached houses on lots larger than those in the residential zones subject to conditions and therefore considers residential development in this zone is considered to be planned development and should be provided for as such in PC1. Considers defining unplanned greenfield areas as those that do not have an urban or future urban zone as of 30th October 2023 is inflexible and unreasonable because the date does not allow for notified plan changes which are already processing that propose to re-zone land for residential use beyond that date. Notes in the recommendations to the Joint Committee Subcommittee for the draft Wairarapa-Wellington-Horowhenua Future Development Strategy (FDS), GW support the submitters site as a growth area.	Delete the definition of Unplanned greenfield development and delete Maps 86-89 Greenfield Areas (planned and unplanned). Or alternatively amend Map 88 to include the site extent of Cannon Point, as shown on the map included in Appendix A, and further described in paragraph 1.12, of submission as a Planned/ existing urban area, and make consequential amendments to subsequent PC1 provisions, to reflect the above.
S260.004	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and	Amend	Considers PC1 objectives do not warrant the prohibition of unplanned greenfield development as it would foreclose any opportunity to manage effects to achieve Target Attribute States and coastal water objectives. Suggests an effects management approach would better allow for the competing directives of the NPS-FW and NPS-UD to be resolved.	Amend as follows if definition of Unplanned Greenfield Development is not deleted: "(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"

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		coastal water objectives.			
S260.005	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Supports policy if relief sought in relation to the definition of unplanned greenfield development is accepted.	Retain only if the relief sought in relation to the definition of unplanned greenfield development is accepted.
S260.006	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Oppose	Concerned the requirement to 'avoid' all new stormwater discharges from unplanned greenfield development leads directly to prohibited activity rule WH.R13. Considers there is no directive in the objectives that justifies the policy taking an avoidance approach and considers it will foreclose any opportunity to manage effects to achieve Target Attribute States and coastal water objectives. Considers an effects-management approach would better allow for the competing directives of the NPS-FW and NPS-UD to be resolved.	Delete policy WH.P16. Or, if this is not accepted, amend it to be consistent with implementing the objectives which requires an effects management approach.
S260.007	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose	Opposes the winter shut down period for earthworks over 3,000m2 as the requirements are onerous and will delay developments, result in unnecessary costs and are not required with the standards set in Policy WH.P30 and included in the rules. Considers that winter works are appropriate to be undertaken if the soil type provides for this and sufficient management of earthworks controls are provided to manage effects, and/or a contractor has demonstrated they can work effectively in these conditions and the project requires works in this	Delete policy WH.P31.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				period. Considers the operational performance standard should be deleted as a policy because it should be site specific.	
S260.008	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Supports intent of the rule but considers the reference to unplanned greenfield development should be deleted.	Amend as follows: "...that is not a high risk industrial or trade premise ~~or unplanned greenfield development,~~ is a permitted activity, provided the following conditions are met..."
S260.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Supports intent of the rule but considers the reference to unplanned greenfield development should be deleted.	Amend as follows: "...that is not a high risk industrial or trade premise ~~or unplanned greenfield development,~~ is a permitted activity, provided the following conditions are met..."
S260.010	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Amend	Supports rule but opposes the reference to the prohibited activity rule WH.R13, relating to unplanned greenfield development.	Amend as follows: The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or Rule WH.R7, ~~or prohibited under WH.R13~~ is a discretionary activity provided the following conditions are met:...

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S260.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Amend	Opposes the reference to the prohibited activity rule WH.R13, relating to unplanned greenfield development.	Amed Rule WH.R12 as follows: The: (a) discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule WH.R2, or (b) discharge of stormwater into water or onto or into land where it may enter a surface water body or coastal water, that is not permitted by Rule WH.R3, or a restricted discretionary activity under Rules WH.R8 or WH.R9, or (c) discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule WH.R4, or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade premise that does not meet the conditions of Rule WH.R11, or (d) use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater into water or onto or into land where it may enter water, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or WH.R7, or a discretionary activity under Rule WH.R10 or WH.R11, ~~or a prohibited activity under WH.R13,~~ is a non-complying activity.
S260.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Opposes rule WH.R13. Considers PC1 objectives do not warrant the prohibition of unplanned greenfield development because it would foreclose any opportunity to manage effects to achieve Target Attribute States and coastal water objectives. Suggests an effects-management approach would better allow for the competing directives of the NPS-FW and NPS-UD to be resolved. Considers stormwater from new unplanned greenfield development should instead be provided for under Rule WH.R11 as a discretionary activity or WH.R12 as a non-complying activity.	Delete Rule WH.R13 and provide for stormwater from new unplanned greenfield development to be managed under Rule WH.R11 as a discretionary activity or Rule WH.R12 as a non-complying activity.
S260.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance	Amend	Notes the clearance of vegetation on Highest Erosion Risk Land (woody vegetation) that is a total area of 200m2 or less in any consecutive 12-month period, and any associated discharge of sediment to	Amend Rule as follows: Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		on highest erosion risk land - permitted activity.		a water where this is not to implement the erosion risk treatment plan or for the control of pest plants is not provided for as a permitted or controlled activity. Therefore, it is a discretionary activity under Rule WH.R19. Considers it is unclear whether it is council's intention for vegetation clearance of 200m2 or less, in this erosion risk overlay, to be a discretionary activity. Assumes this to be a drafting error, . Considers the discretionary activity as it stands is onerous and unnecessary. Considers where there are large properties and track maintenance is required to clear woody vegetation, a permitted activity standard of 200m2 per property is too small. Considers clearance of 2000m2 per property as a minimum or provision for clearing of vegetation for track maintenance should be considered.	surface water body is a permitted activity provided the following conditions are met: **(a) the vegetation clearance is a total of 200m2 or less per property in any consecutive 12-month period, or** ~~(a)~~**(b)** the vegetation clearance is:**(i)** **to undertake track maintenance**, or ~~(i)~~ **(ii)** to implement an action in the erosion risk treatment plan for the farm, or~~(ii)~~ **(iii)** for the control of pest plants, and ~~(b)~~ **(c)** debris from the vegetation clearance is not placed where it can enter a surface water body.
S260.014	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land - controlled activity.	Amend	Considers where there are large properties and track maintenance is required to clear woody vegetation, a permitted activity standard of 200m2 per property is too small. Considers clearance of 2000m2 per property as a minimum or provision for clearing of vegetation for track maintenance should be considered. Considers consequential amendments to this controlled activity rule are sought.	Amend as follows: Vegetation clearance on highest erosion risk land (woody vegetation), of more than a total area of 200m2 per property in any consecutive 12-month period, and any associated discharge of sediment to a surface water body, **that is not a permitted activity under Rule WH.R17,** is a controlled activity provided an erosion and sediment management plan has been prepared in accordance with Schedule 33 (vegetation clearance plan) and submitted with the application for resource consent under this Rule.
S260.015	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance - discretionary activity.	~~Amend~~ Support	Supported if Rules WH.R17 and WH.R18 are amended as sought.	~~Not stated.~~ Amend Rule WH.R17 and WH.R18 as sought.
S260.016	8 Whaitua Te	Rule WH.R23:	Amend	Notes an error with rule wording and that GWRC relayed the intention of this rule is to provide for all	Amend Rule WH.R23 as follows:

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	Whanganui-a-Tara	Earthworks - permitted activity.		earthworks less than 3000m2 per property as a permitted activity, subject to conditions, and will look to correct this error through Clause 16 of the RMA or a submission. Opposes the earthworks rule as it stands and supports any amendment to the Rule to provide for all earthworks where they do not exceed 3000m2 per property in any consecutive 12 month period as a permitted activity.	Earthworks is a permitted activity, provided the following conditions are met: **(a) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, or** ~~(a)~~ **(b)** the earthworks are to implement an action in the erosion risk treatment plan for the farm, or~~(b)~~ **(c)** the earthworks are to implement an action in the farm environment plan for the farm, and ~~(c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and~~ (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, And (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.
S260.017	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	Opposes the shut down period for earthworks included in condition (b) and mater of discretion (8) restricting winter works and preparation for closedown for reasons outlined in submission on Policy WH.P31, subject to the acceptance of amendments to Rule WH.R23 as sought above.	Amend Rule WH.R24 as follows: Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (iii) 30% in any other river, and ~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~ Matters for discretion 1. The location, area, scale, volume, duration and staging and timing of works 2. The design and suitability of erosion of sediment control measures including consideration of hazard mitigation and the risk of accelerated soil erosion associated the staging of works and progressive stabilisation 3. The placement and treatment of stockpiled materials on the site, including requirements to remove material if it is not to be reused on the site 4. The proportion of unstabilised land in the catchment 5. The adequacy and efficiency of stabilisation devices for sediment control 6. Any adverse effects on: (i) groundwater, surface water bodies and their margins, particularly surface water bodies within sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori customary use) or Schedule I (important trout fishery rivers and spawning waters) (ii) group drinking water supplies and community drinking water supplies (iii) mauri, water quality (including water quality in the coastal marine area), aquatic and marine ecosystem health, aquatic and riparian habitat quality, indigenous biodiversity values, mahinga kai and critical life cycle periods for indigenous aquatic species (iv) (iv) the natural character of lakes, rivers, natural

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					wetlands and their margins and the coastal environment (v) natural hazards, land stability, soil erosion, sedimentation and flood hazard management including the use of natural buffers 7. Duration of the consent 8. ~~Preparation required for the close-down period (from 1st June to 30th September each year) and any maintenance activities required during this period~~ 9. Monitoring and reporting requirements
S260.018	13 Maps	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Oppose	Considers the necessity for having unplanned greenfield areas identified on the proposed PC1 maps (and the consequential definition of unplanned greenfield development) is not adequately justified in PC1 or the accompanying S.32 Report. Considers in relation to the Cannon Point site, Map 88 does not accommodate planned residential development where this is provided for in the Rural Lifestyle Zone of the Upper Hut District Plan, nor where it is proposed through re-zoning subject to existing notified plan changes PC50 and the IPI for Upper Hutt. Considers map 88 does not reflect the GWRC officer recommendation that the item should be included as planned development in Upper Hut in the FDS. Considers the definition and approach to what is unplanned urban development is flawed and needs to be reconsidered consistently across each district council.	(a) Delete Maps 86-89 Greenfield Areas (planned and unplanned) OR if relief is not accepted then (b) Amend Map 88 to include the site extent of Cannon Point as a planned/existing urban area as shown on the map included in Appendix A, and further described in paragraph 1.12 of the submission.
S260.019	13 Maps	Map 94: Highest erosion risk land (Woody vegetation clearance) - Te Whanganui-a-Tara.	Amend	Concerned about the pixelated display of the highest erosion risk areas and the associated physical boundaries identified in Map 94. Understands the display is to be corrected, based on discussions with GWRC, and supports this change only on the proviso that the maps accurately located the highest erosion risk on site. Until these are displayed accurately depicting the site these maps are opposed.	Amend the display of Map 94 to better identify the actual physical boundaries of land that is at highest risk of erosion (woody vegetation clearance), to enable related PC1 provisions be interpreted correctly.

S247 Carrus Corporation Ltd

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S247.001	General comments	General comments - definitions	Amend	Considers without a definition, there may be uncertainty about what constitutes a greenfield development in comparison to an infill/brownfield development. Considers a definition of 'greenfield' development will assist in providing certainty regarding the application of new rules. Considers the proposed definition of 'greenfield' development aligns with the definition of an urban environmental allotment under section 76(4C) of the RMA. Suggests this definition will not hinder the ability of large lots to accommodate the establishment of up to 2 dwellings, which is permitted by most District Plans in the region.	Amend as follows: Add definition of greenfield development: **Greenfield Development: The use of land that is predominately vacant with a site area of 4,000m² or greater, where the proposal will result in the development of 3 of more lots or dwellings for residential purposes regardless of staging.**
S247.002	General comments	General comments - overall	Oppose	Supports initiatives to improve the quality of freshwater and the state of freshwater and coastal environments. Opposes PC1 in its current form and requests it be withdrawn to allow for genuine consultation to occur, consideration of matters raised through this submission process, and consideration of the new direction from the central Government. Considers PC1 does not provide sufficient certainty or clarity in the implementation of rules Considers PC1 will have significant financial impacts particularly on pre-committed development projects.	Withdraw PC1

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers PC1 does not provide sufficient certainty or clarity in the implementation of rules.	
S247.003	General comments	General comments – urban development	Oppose	Considers PC1 potentially conflicts with the intended outcomes of the NPS-UD to provide for well-functioning urban environments, including both through infill, and greenfield developments. Notes Policy 6 requires planning decisions that affect urban environments to consider the benefits of urban development and the contributions that development makes to provide or realise development capacity, and this has not been sufficiently considered in PC1 as economic impacts have not been assessed.	Withdraw PC1
S247.004	General comments	General comments - consultation	Oppose	Considers adequate consultation was not carried out with the development community and is concerned the draft version was not sent to the development community despite Subpart 1 of the NPS-FM requiring regional councils to engage with communities and tangata whenua Considers that given the impact and extent of the proposed changes, the publication of a draft plan and consultation with the development community would minimise potential appeals and aid towards a more workable and functioning Natural Resources Plan.	Withdraw PC1
S247.005	General comments	General comments - consultation	Oppose	Considers GWRC should wait to see what changes to the NPS-FM are proposed by the new government coalition to ensure PC1 is in alignment. Considers PC1 was rushed as the plan does not	Withdraw PC1

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				need to be notified until 31st December 2024. Considers the imposition of new rules with immediate legal effect is inconsistent with subpart 1 of the NPS-FM as there is still a significant amount of time before the plan change has to be notified.	
S247.006	2 Interpretation	Hydrological control	Amend	Suggests the hydrological control definition should be expanded to include reference to the measures proposed to manage the flows and volumes and an acceptable solution that is easily and commonly able to be implemented. Considers the current definition does not provide certainty regarding the rate or degree to which hydrological controls need to be implemented on-site and whilst there is mention throughout PC1 on retention, there is no definition as to an acceptable volume of water that needs to be provided for. Considers permitted activity standards (and the supporting definitions) should be clear and easy to understand without any ambiguity. References Table E10.6.3.1.1 of the Auckland Unitary Plan which contains hydrological controls. Notes a 5mm runoff depth has been used in the decision sought but recommends GWRC complete modelling to determine the runoff depth for each catchment as sensitivity to volume changes will vary between catchments. Suggests technical standards could also be referenced.	Request the following to the definition be added : **Management measures may include:** **a) Rapid Infiltration devices such as soak pits;** **b) Permeable paving; or** **c) Rainwater retention tanks which:** **i) are plumbed into the toilet and/or an outdoor tap or taps; and** **ii) where connected to toilets, are capable of being topped up by potable water supply to a maximum volume of 100L.** **Where these measures provide a minimum retention volume of 5mm runoff depth over the impervious area which hydrology controls are required; and** **Provide detention (temporary storage) for the difference between the predevelopment and post-development runoff volumes from the 95th percentile, 24 hour rainfall event minus the 5 mm retention volume or any greater retention volume that is achieved, over the impervious area for which hydrology mitigation is required (unless further detention or infiltration measures are utilised downstream).** **Note:** **Compliance with the definition can be demonstrated by installing a rainwater tank in accordance with Approved Solution #1 of Wellington Water's Managing Stormwater Runoff Version 4 June 2023.**
S247.007	2 Interpretation	Redevelopment	Amend	Considers the definition should exclude minor alterations and additions to existing buildings to provide for the small redevelopment of existing sites	Amend definition and make any other consequential amendments necessary to give effect to this submission point, to provide for small scale alterations and additions to

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				as a permitted activity in associated rules. Notes the suggested 30m² amendment aligns with recent changes to the Building Regulations for sheds to avoid consenting requirements.	existing buildings: For the purpose of assessment of a proposal involving the redevelopment of an existing urbanised property (i.e including brownfield development upgrades to existing roads etc.) in relation to stormwater effects. this includes the replacement, reconstruction or addition (new) of impervious surfaces. Excludes:~~minor~~ maintenance or repairs to roads, carparking areas, driveways and paving installation, maintenance or repair of underground infrastructure or network utilities requiring trenching and resurfacing activities that only involve the re-roofing of existing buildings**New buildings or alterations and additions to existing buildings of less than 30m²**
S247.008	2 Interpretation	Unplanned greenfield development	Oppose	Opposes the proposed prohibited activity rules. Considers the current provisions would make rezoning more costly, and take longer as they would require a plan change to a District Plan and the Natural Resource Plan. Considers that in some instances resource consent is more appropriate than a plan change. For example, when the size of the site or development is not such that a plan change is economically viable, or the effects are discrete and localised making a resource consent process more appropriate. Considers other proposed rules within PC1 that apply greenfield development adequately address effects on water quality effects without needing to prohibit development.	Requests the deletion of this definition and all subsequent references to unplanned greenfield development. ~~Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 which also require an underlying zone change (from rural/nonurban/ open space to urban) though a District Plan change to enable the development.~~ ~~Note: Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023.~~ ~~Amend definition to align with zones under a District Plan and avoid a plan change to both District and Regional Plans:~~ Should the above relief not be obtained, submitter seeks the following revision: Greenfield development within areas ~~identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89~~ **not zoned as urban within a District Plan.** ~~which also require an underlying zone change (from rural/nonurban/open space to urban) though a District Plan change to enable the development.~~ Note: Unplanned greenfield areas are **identified on maps 86, 87, 88 and 89** ~~those areas~~ **and**

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					include those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023. And consequential amendments to other references or policies as needed to align with the above amendment.
S247.009	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Oppose	Opposes prohibited policy and rules. Concerned prohibiting activities can lead to perverse outcomes (experienced with the NES-FW) as there is no consenting pathway to consider proposals that have a net positive impact on the environment, including freshwater and coastal systems.	Amend policy to remove reference to prohibiting unplanned greenfield development. (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.~~
S247.010	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Considers there will be instances where it is not practicable to achieve hydrological controls i.e. when retention is not possible and there are low infiltration rates, more water will be discharged to a water network, even though the peak flows are being contained. Considers source control measures should be included in this policy as they are a way of reducing copper and zinc loads.	Amend policy wording to remove (b) and replace.~~(b) where stormwater discharges will enter a river, hydrological controls either on-site, or off-site via a communal stormwater treatment system~~**(b) Source control techniques that result in copper and zinc load reductions equal to or greater than what would be achieved through on-site or communal stormwater treatment systems or devices designed in accordance with (a).**
S247.011	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Oppose	Opposes use of the term "avoid". Opposes the requirement to seek two separate plan changes if land is to be rezoned.	Request policy is deleted. ~~Policy WH.P16: Stormwater discharges from new unplanned greenfield development Avoid all new stormwater discharges from unplanned greenfield development where the discharge will enter a surface water body or coastal water, including through an existing local authority stormwater network.~~

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S247.012	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose	Opposes the requirement for non-complying resource consent to undertake winter earthworks. Notes that as high rainfall events can occur during any time of the year, and during summer months when the ground is less permeable, it is just as likely that sediment control measures will fail. In some soil conditions (i.e. sand, river gravels) it is preferable works occur when the ground is wet because it reduces the potential for sediment to be blown into waterways. Considers the s32 report fails to justify why this measure is required. Considers the current method of site-specific assessments during winter works in achieving the objectives of the NPS-FW.	Delete policy and related rules. ~~Policy WH.P31: Winter shut down of earthworks~~ ~~Earthworks over 3,000m2 in area shall:~~ ~~(a) be shut down from 1st June to 30th September each year, and~~ ~~(b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).~~
S247.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Amend	Considers connections to or from a local authority stormwater network should be managed by the local authority rather than by resource consent.	Amend Rule WH.R2 to better reflect the requirements for individual properties. Rule WH.R2: Stormwater to land - permitted activity The discharge of stormwater onto or into land, including where contaminants may enter groundwater: (a) that is not from a high risk industrial or trade premise, or (b) that **does not connect to** ~~does not discharge from, or to,~~ a local authority stormwater network, is a permitted activity provided the following conditions are met:
S247.014	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual property to surface water or	Amend	Considers connections to or from a local authority stormwater network should be managed by the local authority rather than by resource consent.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity The discharge of stormwater from an existing individual property into water, or onto or into land where it may enter a surface water body or coastal water,

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		coastal water - permitted activity.			(a) that is not from a high risk industrial or trade premise, or (b) that is not from a port, airport or state highway, or (c) that **does not connect to** ~~does not discharge from, or to,~~ a local authority stormwater network, is a permitted activity, provided the following conditions are met:
S247.015	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	The submitter seeks an 'effectual' amnesty from the rules for all pre-committed projects. Considers the new rules will add costs to committed development projects that haven't been factored into the development costs of project viability. Concerned the immediate legal effect of new rules may adversely affect the viability of committed development projects, as the decision to purchase and proceed with development was undertaken without consideration of PC1. Disagrees with the new rules having immediate legal effect in accordance with Part 2 of the RMA as it does not provide for all three principles of sustainable management which must include economic well-being. Considers the new rules will have significant costs associated with: Re-design to retrofit stormwater quality treatment including consultant costs; Construction of stormwater quality treatment devices Resource consenting costs including the lodgement and processing of a consent or section 127 change of condition application and consultant costs. Holding costs associated with delays in carrying out development. Compliance and Monitoring costs associated with resource consent conditions; Legal costs, particularly where lots or development	Amend Rule WH.R5 and make any consequential amendments to other references or policies as needed to enable pre-committed development projects to proceed without disrupting financial planning. Rule WH.R5.... - permitted activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or new local authority stormwater network, that is not a high risk industrial or trade premise or unplanned greenfield development, is a permitted activity, provided the following conditions are met: (a) **A local authority has accepted a resource consent application for the activity prior to 30 October 2024, or where resource consent was either not required under the Natural Resources Plan, or Greater Wellington Regional Council has accepted a resource consent application for the activity prior to 30 October 2024, and that resource consent is given effect to within 2 years of being granted; or** (b) The proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m² (baseline existing impervious area as at 30 October 202~~3~~**4**); and (c) all new building materials associated with the development shall not include exposed zinc (including galvanised steel) or copper roof, cladding and spouting materials, and (d) the proposal provides hydrological control measures (for example **rapid infiltration devices,**

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				has been sold off the plan, and design changes are necessary to accommodate stormwater quality treatment and hydrological controls; Development contributions applicable to greenfield development. considers the above costs are substantial, and may render projects infeasible. Outlines that the immediate imposition of new rules and associated costs, have not been priced in and will provide uncertainty on the viability of many projects. Considers projects that already have resource consent from a local authority will be the greatest impacted. Requests that whilst under section 86A of the RMA, the rules have immediate legal effect, the rule be written to have a later effectual legal effect. Considers the suggested amendments to Rule WH-R5 would allow sufficient time for pre-committed projects without resource consent to proceed with confidence, and allow pre-consented projects to proceed without design changes or additional consenting costs until their lapse period (typically 5 years). Considers if the new rules are applied to new projects from November 2024 onwards, they can be accounted for in the investment decision, thereby achieving the purpose of the NPS-FM without putting projects at risk of not proceeding. Requests the addition of a sunset clause stating 'given effect to within 2 years' aligning with the lapse period under the COVID-19 Recovery (Fast-track Consenting) Act 2020 so the effectual amnesty would apply to projects that are intended to develop	**permeable paving, or water re-use** ~~rain~~ tanks) onsite or offsite, where discharges will enter a surface water body (including via an existing local authority stormwater network): (e) for all impervious areas associated with a greenfield development, or (f) for all redeveloped and new impervious areas involving greater than 30m2 of impervious area of a redevelopment (of an existing urbanised property), and (g) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (h) the discharge does not contain wastewater, and (i) the concentration of total suspended solids in the discharge shall not exceed: (j) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (k) 100g/m3 where the discharge enters any other water, and where the discharge is not via an existing or new local authority stormwater network: (l) the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (m) the discharge shall not give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than (n) 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (o) 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				within a reasonable timeframe, rather than applying to projects that want to hold or land bank development. Considers the added sunset clause will provide confidence in the delivery of pre-committed projects which will aid in providing additional housing under the NPS-UD. Seeks to include other means of hydrological control in the rule, refer to hydrological control definition above. Requests that whilst under section 86A of the RMA, the rules have immediate legal effect, the rule be written to have a later effectual legal effect. Considers the suggested amendments to Rule WH-R5 would allow sufficient time for pre-committed projects without resource consent to proceed with confidence, and allow pre-consented projects to proceed without design changes or additional consenting costs until their lapse period (typically 5 years). Considers that if new rules apply new projects from November 2024 onwards, they can be accounted for in the investment decision, thereby achieving the purpose of the NPS-FM without putting projects at risk of not proceeding. Requests the addition of a sunset clause of 'given effect to' within 2 years, aligning with the lapse period under the COVID-19 Recovery (Fast-track Consenting) Act 2020 so the effectual amnesty would apply to projects that are intended to develop within a reasonable timeframe, rather than applying to projects that want to hold or land bank development.	(vi) any significant adverse effects on aquatic life.

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				Considers the added sunset clause will provide confidence in the delivery of pre-committed projects which will aid in providing additional housing under the NPS-UD. Seeks to include other means of hydrological control in the rule, refer to hydrological control definition above.	
S247.016	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Considers the timing should align with the feedback provided for Rule WH.R5 Add to a controlled activity recognition of circumstance where hydrological control cannot be achieved.	Amend wording to reference 2024, not 2023 (a) the proposal involves the creation of new impervious surfaces of between 1,000m2 and 3,000m2 (baseline property existing impervious area as at 30 October 202~~3~~**4**)
S247.017	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	merged above	Amend Rule WH.R6 to as follows: ... (d) where stormwater directly or indirectly (through an existing local authority stormwater network) discharges to a river, hydrological control is provided either: i) on-site, or ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has been sized to accommodate the proposed stormwater discharges; or**iii) Where a suitably qualified person has confirmed that soil infiltration rates are less than 2mm/hr or there is no area on the site of sufficient size to accommodate all required infiltration that is free of geotechnical limitations (including slope, setback from infrastructure, building structures or boundaries and water table depth), and rainwater reuse is not available because:** **i. the quality of the stormwater runoff is not suitable for on-site reuse (i.e. for non-potable water supply, garden/crop irrigation or toilet flushing); or** **ii. there are no activities occurring on the site that can**

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					re-use the full 5mm retention volume of water. **The retention volume can be taken up by providing detention (temporary storage) for the difference between the pre-development and post development runoff volumes from the 95th percentile, 24 hour rainfall event minus any retention volume that is achieved, over the impervious area for which hydrology mitigation is required.**
S247.018	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Amend	Considers the timing should align with the feedback provided for Rule WH.R5	Amend wording to reference 2024, not 2023 (a) the proposal involves the creation of new impervious surfaces of between 1,000m2 and 3,000m2 (baseline property existing impervious area as at 30 October 202~~3~~**4**)
S247.019	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Opposes the prohibited policy and rules. Concerned prohibiting activities can lead to perverse outcomes as there is no consenting pathway to consider a proposal that could have a net positive impact on the environment including freshwater and coastal systems. Refers to their rationale on Unplanned Greenfield Development.	Delete and reword rule as follows.~~Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity~~ ~~The use of land and the associated discharge of stormwater from impervious surfaces from unplanned greenfield development direct into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or proposed stormwater network, is a prohibited activity.~~ Should the above relief not be obtained, we seek: Rule WH.R13: Stormwater from new unplanned greenfield development ~~-prohibited activity~~ **discretionary activity**
S247.020	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks -	Amend	Opposes the requirement for non-complying resource consent to undertake winter earthworks. Notes that as high rainfall events can occur during	Amend rule to as follows. Rule WH.R24: Earthworks - restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto

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		restricted discretionary activity.		any time of the year, and during summer months when the ground is less permeable, it is just as likely that sediment control measures will fail. In some soil conditions (i.e. sand, river gravels) it is preferable works occur when the ground is wet because it reduces the potential for sediment to be blown into waterways. considers the s32 report fails to justify why this measure is required. Considers the current method of site-specific assessments during winter works in achieving the objectives of the NPS-FW.	or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, ~~and~~ ~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~
S247.021	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Oppose	Opposes prohibited policy and rules. Concerned prohibiting activities can lead to perverse outcomes (experienced with the NES-FW) as there is no consenting pathway to consider proposals that have a net positive impact on the environment, including freshwater and coastal systems.	Request policy is amended to remove reference to prohibiting unplanned greenfield development. wording proposed is as follows: ~~(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,~~
S247.022	9 Te Awarua-o-Porirua Whaitua	Policy P.P12: Managing stormwater network discharges through a Stormwater	Oppose	Submitter refers to feedback provided on Rule WH.P12 (note no feedback was provided on rule WH.P12 within the submission	Submitter refers to proposed amendment to Policy WH.P12 (note no amendment was provided on policy WH.P12 within the submission)

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		Management Strategy.			
S247.023	9 Te Awarua-o-Porirua Whaitua	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Considers there will be instances where it is not practicable to achieve hydrological controls i.e. when retention is not possible and there are low infiltration rates, more water will be discharged to a water network, even though the peak flows are being contained. Considers source control measures should be included in this policy as they are a way of reducing copper and zinc loads.	Submitter refers to proposed amendment on policy WH.P13 (note no amendment to policy WH.P13 was provided within the submission
S247.024	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Oppose	Opposes use of the term "avoid". Opposes the requirement to seek two separate plan changes if land is to be rezoned.	Submitter refers to proposed amendment on policy WH.P15 (note no amendment to policy WH.P15 was provided within the submission)
S247.025	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose	Opposes the requirement for non-complying resource consent to undertake winter earthworks. Notes that as high rainfall events can occur during any time of the year, and during summer months when the ground is less permeable, it is just as likely that sediment control measures will fail. In some soil conditions (i.e. sand, river gravels) it is preferable works occur when the ground is wet because it reduces the potential for sediment to be blown into waterways. Considers the s32 report fails to justify why this measure is required.	Delete policy and related rules. ~~Policy WH.P31: Winter shut down of earthworks~~ ~~Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).~~

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				Considers the current method of site-specific assessments during winter works in achieving the objectives of the NPS-FW.	
S247.026	9 Te Awarua-o-Porirua Whaitua	Rule P.R2: Stormwater to land - permitted activity.	Amend	Considers connections to or from a local authority stormwater network should be managed by the local authority rather than by resource consent.	Submitter refers to proposed amendment to policy WH.R2.
S247.027	9 Te Awarua-o-Porirua Whaitua	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Amend	Considers connections to or from a local authority stormwater network should be managed by the local authority rather than by resource consent.	Submitter refers to proposed amendment to Policy WH.R3
S247.028	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	The submitter seeks an 'effectual' amnesty from the rules for all pre-committed projects. Considers the new rules will add costs to committed development projects that haven't been factored into the development costs of project viability. Concerned the immediate legal effect of new rules may adversely affect the viability of committed development projects, as the decision to purchase and proceed with development was undertaken without consideration of PC1. Disagrees with the new rules having immediate legal effect in accordance with Part 2 of the RMA as it does not provide for all three principles of sustainable management which must include	Submitter refers to proposed amendment to Policy WH.R3

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				economic well-being. Considers the new rules will have significant costs associated with: Re-design to retrofit stormwater quality treatment including consultant costs; Construction of stormwater quality treatment devices Resource consenting costs including the lodgement and processing of a consent or section 127 change of condition application and consultant costs. Holding costs associated with delays in carrying out development. Compliance and Monitoring costs associated with resource consent conditions; Legal costs, particularly where lots or development has been sold off the plan, and design changes are necessary to accommodate stormwater quality treatment and hydrological controls; Development contributions applicable to greenfield development. considers the above costs are substantial, and may render projects infeasible. Outlines that the immediate imposition of new rules and associated costs, have not been priced in and will provide uncertainty on the viability of many projects. Considers projects that already have resource consent from a local authority will be the greatest impacted. Requests that whilst under section 86A of the RMA, the rules have immediate legal effect, the rule be written to have a later effectual legal effect. Considers the suggested amendments to Rule WH-R5 would allow sufficient time for pre-committed projects without resource consent to proceed with	

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				confidence, and allow pre-consented projects to proceed without design changes or additional consenting costs until their lapse period (typically 5 years). Considers if the new rules are applied to new projects from November 2024 onwards, they can be accounted for in the investment decision, thereby achieving the purpose of the NPS-FM without putting projects at risk of not proceeding. Requests the addition of a sunset clause stating 'given effect to within 2 years' aligning with the lapse period under the COVID-19 Recovery (Fast-track Consenting) Act 2020 so the effectual amnesty would apply to projects that are intended to develop within a reasonable timeframe, rather than applying to projects that want to hold or land bank development. Considers the added sunset clause will provide confidence in the delivery of pre-committed projects which will aid in providing additional housing under the NPS-UD. Seeks to include other means of hydrological control in the rule, refer to hydrological control definition above. Requests that whilst under section 86A of the RMA, the rules have immediate legal effect, the rule be written to have a later effectual legal effect. Considers the suggested amendments to Rule WH-R5 would allow sufficient time for pre-committed projects without resource consent to proceed with confidence, and allow pre-consented projects to proceed without design changes or additional consenting costs until their lapse period (typically 5 years).	

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers that if new rules apply new projects from November 2024 onwards, they can be accounted for in the investment decision, thereby achieving the purpose of the NPS-FM without putting projects at risk of not proceeding. Requests the addition of a sunset clause of 'given effect to' within 2 years, aligning with the lapse period under the COVID-19 Recovery (Fast-track Consenting) Act 2020 so the effectual amnesty would apply to projects that are intended to develop within a reasonable timeframe, rather than applying to projects that want to hold or land bank development. Considers the added sunset clause will provide confidence in the delivery of pre-committed projects which will aid in providing additional housing under the NPS-UD. Seeks to include other means of hydrological control in the rule, refer to hydrological control definition above.	
S247.029	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Considers the timing should align with the feedback provided for Rule WH.R6	Amend wording to reference 2024, not 2023 (a)the proposal involves the creation of new impervious surfaces of between 1,000m2 and 3,000m2 (baseline property existing impervious area as at 30 October 203~~3~~**4**) Amend Rule WH.R6 to as follows ... (d) where stormwater directly or indirectly (through an existing local authority stormwater network) discharges to a river, hydrological control is provided either: i) on-site, or ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has been sized to accommodate the proposed stormwater

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					discharges; or**iii) Where a suitably qualified person has confirmed that soil infiltration rates are less than 2mm/hr or there is no area on the site of sufficient size to accommodate all required infiltration that is free of geotechnical limitations (including slope, setback from infrastructure, building structures or boundaries and water table depth), and rainwater reuse is not available because:** **i. the quality of the stormwater runoff is not suitable for on-site reuse (i.e. for non-potable water supply, garden/crop irrigation or toilet flushing); or** **ii. there are no activities occurring on the site that can re-use the full 5mm retention volume of water.** **The retention volume can be taken up by providing detention (temporary storage) for the difference between the pre-development and post development runoff volumes from the 95th percentile, 24 hour rainfall event minus any retention volume that is achieved, over the impervious area for which hydrology mitigation is required.**
S247.030	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas-controlled activity.	Amend	Considers the timing should align with the feedback provided for Rule WH.R5	Submitter refers to their proposed amendment to Policy WH.R7

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S247.031	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Amend	Submitter refers to feedback provided on Rule WH.P23 (note no feedback was provided on rule WH.P23 within the submission.	Submitter refers to proposed amendment to Policy WH.R23 (that no amendment was provided for policy WH.P23 within the submission)
S247.032	12 Schedules	Schedule 30: Financial Contributions.	Amend	Considers payment of financial contributions for greenfield development should be based on the point source of contaminants, being the impervious area, rather than on a per lot (or EHU) basis. Suggests this should be on a m² basis as it applies to non-greenfield development.	Amend the Part D calculation of level of contribution of Schedule 30 to: D Calculation of level of contribution Financial contributions shall be calculated ~~per EHU for residential greenfield development (Table D1), or~~ per 100m2 for ~~non-residential greenfield~~ development and new roads/state highways. And consequential amendments to other references or policies as needed to align with the above amendment.
S247.033	12 Schedules	D Calculation of level of contribution	Not Stated	Considers the payment of financial contributions should be levied by a local authority at the same time as the payment of other development contributions, for ease of administration, enforcement, and better alignment with when the effect is likely to be present. Suggests the payment of financial contribution be undertaken in a similar manner to rates payments where rates are paid and administered by a local authority, but allocated between regional and local councils. Concerned the current timing of the payment (when consent is given effect to) will add to upfront development costs, particularly for large staged development, putting many projects at risk as many developers rely on pre-sales to obtain funding for works.	Amend the Part D calculation of level of contribution of Schedule 30 to: Financial contributions shall be imposed as a condition of consent and will be collected **by the local authority at the same time as payment of any other financial or development contributions are paid** ~~prior to the consent being given effect to.~~ And consequential amendments to other references or policies as needed to align with the above amendment. **Note a reduced contribution will be applied if the post-development residual contaminant load is less than 15%, or where treatment contributes towards a reduction in off-site contaminants.**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers provisions should be made for circumstances where residual contaminants are being treated on-site i.e. where using a treatment device further reduces contaminants beyond the assumed residual contaminants or where it treats contaminants off-site, such that the net contamination load is reduced following the development i.e. if the development treats flow from upstream.	
S247.034	12 Schedules	D Calculation of level of contribution	Amend	Notes that Schedule 28 states the target load reduction factor for bioretention is 90%, however the financial contribution is calculated based on treating 15% of remaining contaminant loading. Concerned there has not been an Economic Impact Assessment completed to inform these numbers and if PC1 is requiring treatment to 90%, then any financial contribution should be reduced proportionately i.e. 1/3.	Amend the Part D financial contribution as follows: Whaitua Te Whanganui-a-Tara ~~$4,240~~ **2,827** Te Awarua-o-Porirua Whaitua ~~$4,599~~ **3,066** (Noting the submission point above, whereby we seek to remove charges based on EHU and therefore this table should be deleted in entirety) Whaitua Te Whanganui-a-Tara ~~$858~~ **572** ~~$360~~ **240** Te Awarua-o-Porirua Whaitua ~~$858~~ **572** ~~$360~~ **240** Furthermore, these numbers should be assessed following a peer reviewed Economic Impact Assessment.

S093 CentrePort Limited

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S93.001	5.1 Air quality rules	Rule R26: Abrasive blasting outside an enclosed area - permitted activity.	Oppose	Does not support the amendment of the rule to no longer apply in the coastal marine area. Disagrees there is "no precedent or demand" for such activities, particularly within the Commercial Port Area. Notes abrasive blasting of coastal structures is commonplace for maintenance. Considers existing permitted activity standards provide suitable controls and where they cannot be met that a different activity status should apply.	Reinstate the 'coastal' icon so that the rule applies in the coastal marine area.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S93.002	5.1 Air quality rules	Rule R27: Handling of bulk solid materials - permitted activity.	Not Stated	Supports the amendment to exclude the activity as a coastal activity.	Retain as proposed.
S93.003	8 Whaitua Te Whanganui-a-Tara	Objective WH.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved to achieve the coastal water objectives set out in Table 8.1.	Not Stated	Supports the intent of the objective, particularly to "maintain or improve" water quality.	Retain objective as notified.
S93.004	8 Whaitua Te Whanganui-a-Tara	Policy WH.P9: General stormwater policy to achieve the target attribute	Not Stated	Supports the intent of the policy.	Retain policy as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		states and coastal water objectives.			
S93.005	8 Whaitua Te Whanganui-a-Tara	Policy WH.P12: Managing stormwater from a port or airport.	Amend	Seeks removal of the word "avoid" because it is not realistic in a port environment and is out of step with relevant objectives and rules.	Policy WH.P12: Managing stormwater from a port or airport The adverse effects, including on aquatic ecosystem health and mahinga kai, contact recreation and Māori customary use, of the discharge of stormwater from a port, or airport, where the discharge will enter water, including via a local authority or state highway stormwater network, shall be ~~avoided or~~ minimised by: a) identifying priorities for improvement, including methods and timeframes for improvement, and b) having particular regard to protecting sites with identified significant or outstanding values, and c) implementing good management practice including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and d) where required to reduce localised adverse effects, or to meet the target attribute states and coastal water objectives, progressively improving discharge quality over time.
S93.006	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Seeks clarification on the relationship between Rules WH.R5 and WH.R8	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or new local authority stormwater network, that is not a high risk industrial or trade premise or unplanned greenfield development, ~~or a~~ port ~~or~~ airport. is a permitted activity, provided the following conditions are met: Note Where a property connects to a local authority stormwater

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					network, additional connection requirements and authorisations may be required by the network utility operator. For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to WH.R11. For the creation of new or redevelopment of existing impervious surfaces and associated discharge of stormwater from a port or airport. refer to WH.R8.
S93.007	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Amend	Seeks clarification on the relationship between Rules WH.R7 and WH.R8	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity The use of land for the creation of new and/or redevelopment of impervious surfaces of an existing urbanised property and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not a high risk industrial or trade premise, or a port or airport is a controlled activity, provided the following conditions are met: Note For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to Rule WH.R11. For the creation of new or redevelopment of existing impervious surfaces and associated discharge of stormwater from a port or airport, refer to WH.R8.
S93.008	8 Whaitua Te Whanganui-a-Tara	Rule WH.R8: Stormwater from a port or airport - restricted discretionary activity.	Amend	Seeks clarification on the relationship between Rules WH.R5, WH.R7 and WH.R8. Suggests a single rule may be more efficient.	Rule WH.R8: Stormwater from a port or airport- restricted discretionary activity The use of land for the creation of new and/or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a port or airport into water, or onto or into land where it may enter a surface water body or coastal water, including through a local authority stormwater network, is a restricted discretionary activity where the target attribute state for copper and zinc in Table 8.4 is met for a relevant part Freshwater Management Unit or the coastal water objective for copper and zinc in

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					Table 8.1 is met in the relevant coastal water management unit. Matters for discretion 1. The management of the adverse effects of stormwater capture and discharge, including on aquatic ecosystem health and mahinga kai, contact recreation and Māori customary use, and as required by Policy WH.P12 2. The management of effects on sites identified in Schedule A (outstanding water bodies), Schedule B (Nga Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (indigenous biodiversity) 3. Minimisation of the adverse effects of stormwater discharges 4. Provision for hydrological control measures where discharges will enter a surface water body (including via an existing local authority stormwater network), and water sensitive urban design 5. Requirements of any relevant local authority stormwater network discharge consent Note Rules WH.RS and WH.R7 do not apply to discharges of stormwater from a port or airport.
S93.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Oppose	Does not support non-complying activity status for activities that do not meet the requirements of Rule WH.P8. Suggests discretionary activity status to be retained as with the operative NRP. Notes existing constraints at the port [CentrePort].	Retain discretionary activity status for activities that cannot comply with Rule WH.R8.
S93.010	13 Maps	Map 79: Part freshwater management units and target attribute	Amend	Concerned with the mapping of the management units and whether this is deliberate or there is a mapping error.	Amend the boundary of the Wellington urban FMU to accurately reflect the extent of land at Centre Port's container wharf, and to ensure that there is not overlap with the coastal water management unit. Remove the Wellington urban FMU from wharves and apply the 'Te Whanganui-a-Tara harbour and estuaries' coastal water management unit to these areas.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		state sites (rivers) - Te Whanganui-a-Tara.			Alternatively, if the mapping extent is not erroneous, provide explanation for the unit boundary and the discrepancy between map layers.
S93.011	13 Maps	Map 82: Coastal water management units - Te Awarua-o-Porirua.	Amend	Concerned about how the boundaries for the management units have been mapped. Considers that the Wellington Urban FMU should apply to land and that Te Whanganui a Tara harbour and estuaries management unit should apply to the CMA.	Amend the boundary of the Te Whanganui-a-Tara harbour and estuaries' unit to accurately reflect the extent of coastal marine area adjacent to CentrePort's container wharf, and to ensure that there is not overlap with the Wellington urban FMU. Remove the Wellington urban FMU from wharves and apply the 'Te Whanganui-a-Tara harbour and estuaries' coastal water management unit to these areas. Alternatively, if the mapping extent is not erroneous, provide clear and reasoned explanation for the unit boundaries and the discrepancy between map layers.

S288 China Forest Group Company New Zealand Ltd

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S288.001	General comments	General comments - overall	Not Stated	"Considers several aspects of PC1 are poorly founded and require considerable research and explanation. Notes the following points of concern: - the consultation/representation process is flawed and short-changed, directly impacting sectors. - controls extend beyond the recommendations of whaitua committee reports. - rules that apply to forestry that are not supported by GWRC data and past records. - the rules are unable to be implemented without loss of estate due to the spatial logistics of harvesting and roading. - there has been no consideration of the ETA and other cost liabilities contingent upon non-replant of	Remove the sections of PC1 related to forestry. Align rules to those of the NES-CF. Work collaboratively with industry participants and land-owners to implement good practice, and where needed, engage on how to refine and plan land management outcomes that will fulfil the objectives without excessive bureaucracy and cost.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				land retired from PC1 rules. - duties under the NES Regulation 6 Stringency insufficiently executed. - the s32 analysis is inadequate. "	
S288.002	General comments	General comments - consultation	Not Stated	"Acknowledges the necessity of PC1 to respond to the requirements of the NPS-FW, and acknowledges the purpose of the whaitua committees to resolve issues before plans or rules were made. However, notes there was only one identifiable party with forestry expertise in Te Awarua-o-Porirua Whaitua until 2018, and no such expertise within Te Whaitua te Whanganui-a-Tara. Concerned further engagement with affected sectors was not undertaken between completion of action plans and publishing of PC1, noting a divergence between PC1 rules to achieve freshwater objectives and the whaitua committees' recommendations. Notes replanting on nominated high risk land is not included as a non-complying use, but is intended to be rectified by way of submissions by GWRC. Considers it inappropriate to insert rules that have not been included in public documentation. Considers it is bad faith to notify significant changes from the NRP with limited time to make submissions. Considers forestry, and sectors that may potentially be significantly adversely affected, have been under-represented in development of the PC1 outcomes. Considers direct engagement with the sector should have been undertaken to understand the implications and practicality of the rules. No concerns raised by the submitter with the recommendations of the whaitua committees, noting the expectations of those recommendations that the sector and GWRC would work within the existing framework to achieve water quality objectives. Considers the outcomes are materially different,	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				and notes the timeframe for the submission process limited for the required research and engagement needed. Concerned submissions are used to rectify oversights not included in PC1. "	
S288.003	General comments	General comments - plantation forestry	Not Stated	Notes major disparities between the whaitua committee recommendations and PC1 rules. Notes the TAP committee considered more stringent rules for forestry to achieve the sediment objectives, but concluded the permitted framework of NESPF should be given time to be implemented, and that understanding and mapping erosion prone land at the local whaitua scale was important to inform future planning. Notes that no recommendations were made by the TAP that plantation forests should be retired, nor the need identified for stringency beyond the (then) NES-PF. Notes that while recognising potential water quality risks from forestry, neither whaitua committee recommended an explicit need to retire areas of production forestry. Notes neither whaitua committee considered a need for major strengthening of the regulatory regime, but rather recognised the (then) NES-PF and urged a focus on education, implementation, monitoring and enforcement where necessary. Notes the whaitua recommendations sought close liaison between the sector and GWRC land management staff when looking at land use management planning around high-risk erosion sites. Notes neither whaitua committee made recommendations to address an explicit link between forestry and water quality attribute standards or objectives.	Not stated
S288.004	General comments	General comments - plantation forestry	Not Stated	"References data from monitoring sites and an ecological assessment which indicate very small proportions of the Pouewe Catchment-Horokiri have been exposed to potentially elevated levels of sedimentation above baseline from forestry activity, and that there is at least reasonable water quality.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers it unlikely that forestry has led to the poor state of the Horokiri for the following reasons: - timing and scale of forestry activity - the small percentage of the catchment under harvest over the prior 20 years - large proportions of the catchment under closed canopy forest at any one time - the large percentage of the catchment under livestock management - immediate proximity of major highways and highway construction. "	
S288.005	General comments	General comments - plantation forestry	Not Stated	Cites aerial sequences and monitoring data which suggest the effects of harvesting have not been as significant as assumed, given harvesting and earthworks have been in train for an extended period until the latest published monitoring, and given assumed effects are expected to be cumulative downstream. Notes a survey which ranked the catchment as "average" and likely representative of fish diversity. Notes almost all harvesting and earthworks undertaken in the contributory forest was undertaken prior to the NES-PF/CF.	Not stated
S288.006	General comments	General comments - plantation forestry	Not Stated	Cites aerial sequences and monitoring data which suggest the effects of harvesting and earthworks have not been as significant as assumed, given harvesting and earthworks have been in train for an extended period until the latest published monitoring, and given assumed effects are expected to be cumulative downstream.	Not stated
S288.007	General comments	General comments - plantation forestry	Not Stated	Cites aerial sequences and monitoring data which suggest factors other than harvesting are influencing lowered attribute states in the Te Awa Kairangi forested mainstems-Pakaratahi.r catchment, given there is no harvesting activity and there is a dominance of closed canopy vegetation within the catchment.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S288.008	General comments	General comments - plantation forestry	Not Stated	"Cites aerial sequences and monitoring data which suggest it is unlikely that plantation forest activities are a major factor in poor clarity and MCI attribute states within the Te Awa Kairangi rural streams-Mangaroa catchment, given there are low suspended sediments and the low proportion of the total catchment subject to recent or long-term harvesting and earthworks. Considers the long length of the main stem of the catchment proceeding through pastoral and agricultural land use is a more likely explanation. Notes the tributaries that are under pine forest were modelled at a higher status than the main stem and while this may reflect the harvesting status at the time the modelling was done, it also reflects the established science that over a long time series, plantation forests will generate better water quality than current pastoral use. Notes an ecological report which detected the presence of fish, indicating that water quality in the small plantation tributaries are likely better than the main stem of the Mangaroa. "	Not stated
S288.009	General comments	General comments - plantation forestry	Not Stated	"Recognises that forest harvesting and earthworks can locally and temporarily raise sediment levels during and immediately after operations. However, considers over the long-term, impacts on waterbodies are low and often trend towards baselines established for native forest areas. Notes forestry activities have been undertaken in preceding years in catchments displaying good water quality results. Notes harvesting occupies relatively small proportions of the total catchments for extended timeframes, and have not resulted in NoF attribute values declining below objectives. Further notes that due to the spatial layout of surrounds, expansion of plantations, other than onto farmland, is not possible.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Notes council monitoring results in other catchments, particularly Horokiwi and Mangaroa, are relatively poor and while harvesting in portions of these catchments has been undertaken in recent years the proportions of the total catchment areas subject to harvest are low. Notes the waterbodies in these catchments pass though large proportions of pastoral agricultural land and in the case of the Horokiwi and its main tributary, remain close to long reaches of heavily used highway and the earthworks associated with the recently completed Transmission Gully SHI. Considers it is highly likely given the current status of the streams, that a focus on the other land uses will generate the standards required notwithstanding that updated and upgraded attention to sediment controls in forestry earthworks is a legitimate expectation. Considers the temporal effects of forestry in relation to land use contaminant effects have not been recognised. Considers while all land use creates contaminant effects, a short term increase in adverse effects that then return to levels similar to natural baseline especially if assisted by other landuse good practice, is very different to an adverse effect (even when mitigated by good practice) arising every day from a land use such as farming or urban use. By definition that becomes a permanent 'pressure' change to the environment. "	
S288.010	General comments	General comments - plantation forestry	Not Stated	"Considers GWRC's assessments of the efficacy of the regulatory framework is based on standards that predate the current regime, noting forestry activity in some catchments has been ongoing since before the NES-PF and NES-CF. This includes first rotation planting that had no regulated riparian setbacks from streams or regulation related to	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				harvesting around or over streams nor discharge permits. Notes neither whaitua committee recommended the introduction of stringent new rules, and instead advocated that the NES-PF is given time to adjust and bed in backed up by, education, monitoring and where and if necessary, enforcement. Notes existing operations with constructive interactions between monitoring staff and forest management, including testing alternatives to achieve the best results possible. Notes most forestry companies review their plantable boundaries after harvest and as a result, most second rotation estates see increased non-productive reserve, retirements, and riparian areas, and in many cases riparian buffers are much larger than the minimum. Considers past retirements and riparian exclusions from previous operations reflect the sentiment of the whaitua committees in respect of promoting good land use and land use decision making, education, and working with Council land managers to achieve good outcomes. Concerned that this existing work has not been recognised."	
S288.011	General comments	General comments - plantation forestry	Not Stated	Considers there is no argument that earthworks at the time of harvest is the largest manageable contributor to sediment yield in forestry. These concerns were recognised in regulations of the NES-PF and NES-CF to target sediment generation, similar to the requirements of farm plans. Notes the requirement for erosion and sediment controls plans in Policy WH.P28(b), Rule WH.R20(b) and Schedule 34, which reference forest practice guides, which have had limited time to bed in. Notes that based on GWRC data, the state of stream water quality reflected the cumulative effects of activities predating the NES-	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				PF. Considers the discharge standard of 100g/m3 does not relate to a particular stream attribute, topography, geology or soils of the whaitua. Considers the standard is a uniform standard irrespective of activity or location/circumstance and appears to be principally designed around the use of point source discharges to water from large sediment capture and concentration ponds with fixed infrastructure or without flocculation, which cannot often be utilised in a forestry context. Considers the standard difficult to implement, does not deliver real-time feedback, and has no temporal component. Notes main methods for managing forestry earthworks as set out in forestry practice guides, and that discharges are largely diffuse. Considers the requirements for farm plans a corollary. Considers the visual clarity standard is more relevant to rural land use. Nevertheless, considers here is a perversity in the requirement for a lower decline in visual clarity in class 1 and schedule F1 rivers, as those rivers often come from areas inclusive of plantation forestry. Considers allowing higher clarity loss in lower quality rivers acknowledges continuation of higher levels of contaminants. Considers this area needs reconsideration and there should be an approach focused on education, training and where necessary enforcement, as recommended by the whaitua committees, rather than new rules and variants of the NES-CF.	
S288.012	General comments	General comments - plantation forestry	Not Stated	Considers there is little cognisance in PC1 of the spatial and temporal patterns of harvesting, and the influence this may or may not have on the attribute states of relevant catchments. Considers NPS-FW obligations have been relied on to avoid delaying actions notwithstanding incomplete information. Notes that from the data available, NoF targets were being met in catchments that are largely	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				forested and where harvesting took place and are expected to continue to do so. Considers GWRC has overlooked that in catchments with a relatively small proportion of plantation, and where their reaches aligned with pastoral and urban infrastructure, there were poorer attribute results. Notes this conforms with NZ-wide trends that water quality attributes decline in order from undisturbed native forest, exotic forest, pastoral land use and urban. Considers GWRC has assumed that regulations for earthworks and harvesting under the NES-PF have no efficacy toward achieving the goals of the NPS-FW, but at the time of the published data being collected, the NES-PF was new and most of the harvesting that may have contributed to adverse freshwater outcomes had been undertaken in the prior decade. Considers GWRC have not considered that as forests progressed through their first to second rotations, normal practice and NES regulatory requirements saw provision of increased setbacks and retirement and reservation of problematic harvest areas. Concerned that while not all desired data was available, and an absence of such data was not a reason to avoid mitgatory actions, data that was available did not trigger a need or urgency for the whaitua committees to recommend significant and stringent changes to the regulatory framework surrounding forestry.	
S288.013	General comments	General comments - plantation forestry	Not Stated	Concerned with the approach taken to define areas of "high erosion risk" and the application of those findings. Considers it impractical and will result in write-off of much larger areas than estimated by GWRC. Notes that predictions from cutover are likely to significantly overestimated yield in the universal erosion model. Notes research that confirms sediment contributions from poorly controlled earthworks outweigh those from the	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				cutover. Concerned about the use of a lidar surface to inform the mapping of highly erosion prone areas, as lidar surface does not represent the underlying bedrock surface.	
S288.014	General comments	General comments - plantation forestry	Not Stated	Considers the erosion susceptibility layers are based on information that excludes geological considerations and has not been peer reviewed. Considers the 5m2 resolution of the underlying lidar and the method applied will invariably be wrong, and a poor predictor of stability in the field, leading to areas being retired that were not at risk of slipping, as well as areas not being retired that may suffer landsliding in severe weather events. Considers the methodology for "Highest Erosion Risk - Plantation" has led to 'pixilation', which is impractical for forestry activities as rules could enable forestry in one patch and disallow it in an adjacent patch. Notes several factors which determine harvesting feasibility, resulting in more land needing to be retired than suggested in GWRC data. Estimates that in the estate GFG manages, anything from an average of 9% up to 18% might be retired due to PC1 rules. Notes recommendations from whaitua committees that could be applied to forestry, including developing site and property level plans with landowners, and funding and support for sediment mitigation activities.	Not stated
S288.015	General comments	General comments - plantation forestry	Not Stated	Considers the total area of compulsory retirement could be substantially greater than assessed by GWRC. Concerned there is the potential for the total write-off of plantation sites, and that this should have been assessed in the s32 analysis.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S288.016	General comments	General comments - plantation forestry	Not Stated	Notes the rates relief set out in Method M44 are likely to be miniscule to zero, given the land will have no commercial value upon implementation of PC1. Considers advice should be free given the public interest being served. Concerned there is no meaningful certainty or long-term commitment, given the short-term nature of local body priorities.	Not stated
S288.017	General comments	General comments - plantation forestry	Not Stated	Considers the obligations under the ETS have not been given consideration. Questions why a forest owner should pay for restocking an area for the benefit of the wider public, to avoid liabilities from a rule created in the wider public interest. Questions who will bear the cost and the liability of ongoing management of native forest reforestation and the risk and cost of a ETS compliant forest where reversion is the chosen route. Concerned non-harvest may be the best option for forest owners due to the cost of PC1 and lack of future economic land use options, and questions who will compensate for stranded assets or potential liabilities if there is synchronous collapse. Considers proposed compensation and assistance methods are practically worthless.	Not stated
S288.018	General comments	General comments - current legislation	Not Stated	Concerned about the reliance on Regulation 6 of the NES-PF (now NES-CF) to enable rules which require consenting for forestry activities and abandonment of a portion of productive estate without demonstrating the need for this stringency in PC1. Considers GWRC's water quality data is insufficient and does not support the stringency upon forestry it seeks to apply. With respect to forestry activities, considers there is insufficient evidence to support the objectives and attribute limits sought. Notes some monitoring sites are already meeting attribute targets, and where not, the relative role of forestry activity is small.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers drivers for poor quality likely arise from the extended proximity of reaches to agricultural activity, major highways and urban and semi-rural development. Notes it is unclear how an "equitable" share based on area aligns with an effects-based response to partitioning sediment budget against land uses. Considers the proposed rules are unjustified due to well-established knowledge that production forests are likely to produce more sediment during harvest than pastoral agriculture on the same landform but return to near natural baselines shortly thereafter; and nationwide consistency of trends across land use of declining water quality across most attributes from native forest, exotic forest, pastoral agriculture, cropping and urban. Considers increased sediment yield relative to pastoral land use is offset by decades of below average yield, and that effects are a permanent day-to-day feature on pastoral sites. Concerned a justifiable, quantifiable link between the action and the water quality response has not been provided for blanket rules to retire an allocated portion of private forestry land use. Considers that at the time of the deliberations of the whaitua committees, any effects on water in the whaitua that could have been attributed to forestry activity were a cumulative summation of previous years of activity predating the NES-PF/CF. Disagrees that the NES-PF/CF allows activities as permitted and does not enable control over operations, noting several mechanisms for control under the NES-PF/CF. Considers the recommendations of the whaitua committee should be reflected, and effort devoted towards understanding industry practice guides,	

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				working with the sector, and focusing on education, awareness, monitoring, compliance and engagement. Notes similar methods are normalised in response to issues around pastoral agriculture (via farm plans), but not for forestry.	
S288.019	General comments	General comments - current legislation	Not Stated	Concerned the section 32 report does not adequately demonstrate the need for the stringency proposed in PC1. Submitter references parts of the section 32 analysis which they disagree with. Notes the s32 analysis states forestry is a major land use in the two whaitua at 13.5% and 8% respectively and considers these figures unhelpful in isolation from other uses of land, noting it is also stated that the area has recently reached or is nearing commercial maturity, so harvesting is consistently occurring and expected in these FMU. Concerned GWRC have undertaken their section 32 analysis on the basis of a value judgement comparison between their 'preferred' option being PC1, the 'status quo' and an alternative with additional measures which involves option 1 plus a ""exposed area"" regulation.	Not stated
S288.020	General comments	General comments - overall	Not Stated	The submitter has provided their own detailed response to the options assessment of costs, benefits and efficiency and effectiveness in pages 39-43 of their original submission.	Not stated
S288.021	2 Interpretation	Afforestation	Amend	Considers there is misalignment with the NES-CF.	Amend to: has the same meaning as given in section 3 of the Resource Management (National Environmental Standards tor Commercial Forestry Regulations 2023.
S288.022	2 Interpretation	Earthworks	Support	Avoids unintended capture in general earthworks rules	Retain deferral of definition to the NES-PF/CF earthworks definition.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					Align with NES-C.
S288.023	2 Interpretation	Erosion and sediment management plan	Amend	Considers separate schedules creates confusion, noting there is overlap between existing NES-CF requirements and PC1.	Work to NES-CF schedule 4 & 5. Avoid cross-over and overlap with existing processes developed under the NES-CF.
S288.024	2 Interpretation	Harvesting	Amend	Considers there is misalignment with the NES-CF.	Amend to: has the same meaning as given in section 3 of the Resource Management (National Environmental Standards tor Commercial Forestry Regulations 2023.
S288.025	2 Interpretation	Highest erosion risk land (plantation forestry)	Oppose	Considers the map process inappropriate for purpose and unjustified.	Delete. Consult properly and work with industry.
S288.025	2 Interpretation	Highest erosion risk land (woody vegetation)	Oppose	Considers the map process inappropriate for purpose and unjustified.	Delete. Consult properly and work with industry.
S288.026	2 Interpretation	Mechanical land preparation	Amend	Considers there is misalignment with the NES-CF.	Amend to: has the same meaning as given in section 3 of the Resource Management (National Environmental Standards tor Commercial Forestry Regulations 2023.
S288.027	2 Interpretation	Registered forestry adviser	Amend	Notes registered members of the NZ Institute of Forestry are automatically also Registered Forestry Advisors.	Add sub-clause (d):**and includes a Registered Member of the New Zealand Institute of Forestry.**
S288.029	2 Interpretation	Replanting	Amend	Considers there is misalignment with the NES-CF.	Amend to: has the same meaning as given in section 3 of the Resource Management (National Environmental Standards tor Commercial Forestry Regulations 2023.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S288.030	2 Interpretation	Stabilisation	Amend	Notes other methods are not included. Concerned PC1 proposes Schedule 34 ESC, that references methods from forest practices guides, but these are missed from the definition, which only includes GWRC ESC guideline 2021.	Clarify relationship between earthworks and forestry earthworks.
S288.031	2 Interpretation	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)	Amend	Considers there is misalignment with the NES-CF.	Amend to: has the same meaning as given in section 3 of the Resource Management (National Environmental Standards tor Commercial Forestry Regulations 2023.
S288.032	5.4 Beds of lakes and rivers	Rule R128: New structures - permitted activity.	Amend	Considers there is misalignment with the NES-CF.	Amend to: has the same meaning as given in section 3 of the Resource Management (National Environmental Standards tor Commercial Forestry Regulations 2023.
S288.033	6 Other methods	Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-	Amend	Notes threatened freshwater species exist within and utilise habitat provided by plantations.	Require action plans for species to include partnership with landowners/ forest owners within whose areas such species occupy habitat or are dependent upon the ecosystem services supporting the habitat.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Porirua Whaitua.			
S288.034	6 Other methods	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	Supports objective, however notes the need to include working with landowners.	Require prioritisation to include consultation with landowners where action identified as required.
S288.035	6 Other methods	Method M41: Identifying and responding to degradation in freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	Considers the text, purpose and execution unclear. Supports publishing of trends provided monitoring is sufficient. Considers the identification of the trend of degradation as "not being natural" is mis-scoped. Considers the purpose should be identification of trend(s) related to TAS that are negatively divergent from the Whaitua action plans. Considers prior to introducing a plan change, any response should involve reviewing the plan TAS for applicability, reliability of data, the degree to which current regulation has spurred changes in practices, and any other influences on efficacy.	Review and rewrite.
S288.036	6 Other methods	Method M43: Supporting	Support	Notes national trend of water in urban environments as consistently the poorest and considers it is essential this is addressed.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		the health of urban waterbodies.			
S288.037	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Amend	Considers this reflects the recommendations of whaitua committees.	Amend to include:**deliver a specific programme of engagement with forestry practitioners**
S288.038	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.	Amend	Seeks clarification on "waiora state", noting natural character is not a condition fixed in time. Considers the description needs to include the caveat that natural character refers to a waterbody's state in response to input conditions that are managed to achieve a level of naturalness. Notes climate change may mean natural character is not the same as current targets, which risks a mismatch between what is legally enforced and what is achievable.	Include the caveat that natural character refers to a waterbodies state in response to a variety of input conditions that are managed to achieve a level of naturalness.
S288.039	8 Whaitua Te Whanganui-a-Tara	Objective WH.O2: The health and wellbeing of Te Whanganu	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		i-a-Tara's groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora.			
S288.040	8 Whaitua Te Whanganui-a-Tara	Objective WH.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved to achieve the coastal water objectives	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		set out in Table 8.1.			
S288.041	8 Whaitua Te Whanganui-a-Tara	Objective WH.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved to achieve the coastal water objectives set out in Table 8.1.	Support	Not stated	Not stated
S288.042	8 Whaitua Te Whanganui-a-Tara	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	Support	Not stated	Not stated
S288.043	8 Whaitua Te	Objective WH.O8: Primary	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	contact sites within Te Awa Kairangi/Hutt River, Pākuratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact.			
S288.044	8 Whaitua Te Whanganui-a-Tara	Objective WH.O9: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Oppose	Considers the requirement for attribute improvement in all river reaches if TAS is not met in Prt FW management unit monitoring sites does not reflect good management. Considers a failure to meet TAS at a part FMU monitoring site should require identification of the problem source and focus on raising TAS performance in that area. Notes TAS in some sub-catchments may already be met and are not practicably able to be improved.	Adjust to reflect good management.
S288.045	8 Whaitua Te Whanganui-a-Tara	Policy WH.P1: Improvement of aquatic ecosystem health.	Amend	Considers the term 'land use' in sub-clause (d) is more associated with rural or primary production land uses. Seeks the inclusion of urban land use as it is a major source of contaminants.	Clarify to include urban land use.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S288.046	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	Regarding clause (f), notes the specified activities are already actively managed and seeks amendment to reflect management in accordance with established regulatory frameworks and good practice. Suggests similar amendments can be applied for clause (h), noting 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.	Amend clause (f) to reflect management of specified activities in accordance with established regulatory frameworks and good practice. Consider similar amendments for clause (h).
S288.047	8 Whaitua Te Whanganui-a-Tara	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Oppose	Considers freshwater action plans should be prepared in partnership with mana whenua and the community.	Require Action Plans to be prepared in partnership with mana whenua and the community consultative groups **"shall implement the recommendations of the relevant whaitua committees, identifying in detail, the actions, including where relevant, justifiable and effective, additional regulation to achieve the target attribute states as well as other non-regulatory, means to support relevant environmental outcomes".**
S288.048	8 Whaitua Te Whanganui-a-Tara	Policy WH.P4: Achievement of the visual clarity target attribute states.	Neutral	Does not disagree with the aggregated outcome reflected at the WQ monitoring site, however considers there is insufficient WQ monitoring in the wider sub-catchment to determine the primary cause of poor clarity. Therefore considers action to achieve the outcome may be mis-targeted.	Not stated
S288.049	8 Whaitua Te Whanganui-a-Tara	Policy WH.P6: Cumulative adverse effects of point	Neutral	Notes typo in clause (c)(ii).	Amend clause (c)(ii): in determining the improvement to water quality required in (ii~~i~~), and...

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		source discharges .			
S288.050	8 Whaitua Te Whanganui-a-Tara	Policy WH.P8: Avoiding discharges of specific products and waste.	Support	Not stated	Not stated
S288.051	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges .	Amend	Notes clause (c) does not include temporal matters to be taken into account.	Add a subclause (vi) to account for temporal nature of any discharge.
S288.052	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	Seeks clarification on what woody vegetation can be and for options to be provided.	Make provision for indigenous and exotic permanent forest, subject to controls to provide for better alternative income opportunities for farmers.
S288.053	8 Whaitua Te Whanganui-a-Tara	Policy WH.P25: Managing rural land	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		use change.			
S288.054	8 Whaitua Te Whanganui-a-Tara	Policy WH.P26: Managing livestock access to small rivers.	Support	Not stated	Not stated
S288.055	8 Whaitua Te Whanganui-a-Tara	Policy WH.P27: Promoting stream shading.	Support	Not stated	Not stated
S288.056	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Oppose	Considers the policy enables rules based on insufficient data, is not aligned with whaitua committee recommendations, and is not supported by Council's data. Concerned the rules are not practicable and imply write-off of larger areas and neither the efficacy of the existing regulatory framework under the NES-PF/CF, nor the gains of the proposal, have been adequately identified. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector.	Remove policy and reset to recognise substantive deficiencies.
S288.057	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Oppose	Considers the policy sets up a confused pathway between the definitions, policy, general earthworks rules, and forestry earthworks under forestry rules.	Clarify that the policy refers to general earthworks and does not apply to earthworks in forestry. Include new policy covering forestry earthworks and relate to the regulations of the NES-CF separation of earthworks. Objectively assess needs for stringency and utilise NES-CF as intended.
S288.058	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Oppose	Considers the 100g/m3 standard is not related to actual sedimentation levels and is ill-suited to diffuse discharge from land. Notes the measurement method is retrospective rather than real-time. Considers the clarity rule has perverse outcomes, noting that plantation forests often have high macroinvertebrate indices.	Clarify that the policy refers to general earthworks and does not apply to earthworks in forestry.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S288.059	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose	Notes forestry continuously supplies feedstock for industry and markets and cannot be stopped. Notes earthworks are programmed to be done mainly over summer and drier periods, however the policy makes no provision, continuity, nor emergency and maintenance.	Clarify that general earthworks do not apply to forestry. Earthworks for forestry to be to be undertaken under NES-CF.
S288.060	8 Whaitua Te Whanganui-a-Tara	Rule WH.R1: Point source discharges of specific contaminants - prohibited activity.	Support	Not stated	Not stated
S288.061	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Amend	Notes no threshold is provided for sub-clause (d) and that it is unrealistic. Notes there may be "exacerbation" of flooding to a downslope property if rainfall intensity is severe enough.	Amend to include threshold or other text to recognise high intensity, rainfall events.
S288.062	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water – permitted activity.	Oppose	Considers there is confusion between the definitions and their application. Assumes the rule is intended to apply to urban situations and questions if it applies for forestry land use. Considers the 50 g/m3 threshold for Schedule F1 streams or those with high MCI establishes a perverse outcome, relative to those not on Schedule 1 and low MCI. Notes Map 77 pg 293 and schedule 1 show streams and tributaries include plantations within catchments that have been previously harvested. Notes high MCI recordings are a regular feature of plantation forest streams. Considers the rule potentially penalises productive forestry in these catchments, despite being compatible with NoF/TAS objectives. Therefore considers the rule is permissive to land	Clarify that rule applies to urban and industrial or similar circumstances. Detach from rural land use and remove potential overlap with forestry regulations. Amend to remove perverse outcomes created by rule - remove grams/m3 discharge requirements and utilise mixing protocols only in rural diffuse discharge situations.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				use in catchments already below standard, and is contrary to policy objectives.	
S288.063	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Oppose	Considers there is confusion between the definitions and their application. Assumes the rule is intended to apply to urban situations and questions if it applies for forestry land use. Considers the 50 g/m3 threshold for Schedule F1 streams or those with high MCI establishes a perverse outcome, relative to those not on Schedule 1 and low MCI. Notes Map 77 pg 293 and schedule 1 show streams and tributaries include plantations within catchments that have been previously harvested. Notes high MCI recordings are a regular feature of plantation forest streams. Considers the rule potentially penalises productive forestry in these catchments, despite being compatible with NoF/TAS objectives. Therefore considers the rule is permissive to land use in catchments already below standard, and is contrary to policy objectives.	Clarify that rule applies to urban and industrial or similar circumstances. Detach from rural land use and remove potential overlap with forestry regulations. Amend to remove perverse outcomes created by rule - remove grams/m3 discharge requirements and utilise mixing protocols only in rural diffuse discharge situations.
S288.064	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Oppose	Considers there is confusion between the definitions and their application. Assumes the rule is intended to apply to urban situations and questions if it applies for forestry land use. Considers the 50 g/m3 threshold for Schedule F1 streams or those with high MCI establishes a perverse outcome, relative to those not on Schedule 1 and low MCI. Notes Map 77 pg 293 and schedule 1 show streams and tributaries include plantations within catchments that have been previously harvested. Notes high MCI recordings are a regular feature of plantation forest streams. Considers the rule potentially penalises productive forestry in these catchments, despite being compatible with NoF/TAS objectives. Therefore considers the rule is permissive to land use in catchments already below standard, and is contrary to policy objectives.	Clarify that rule applies to urban and industrial or similar circumstances. Detach from rural land use and remove potential overlap with forestry regulations. Amend to remove perverse outcomes created by rule - remove grams/m3 discharge requirements and utilise mixing protocols only in rural diffuse discharge situations.
S288.065	8 Whaitua Te	Rule WH.R12:	Oppose	Considers there is confusion between the definitions and their application. Assumes the rule is intended	Clarify that rule applies to urban and industrial or similar circumstances. Detach from rural land use and remove

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	All other stormwater discharges - non-complying activity.		to apply to urban situations and questions if it applies for forestry land use. Considers the 50 g/m3 threshold for Schedule F1 streams or those with high MCI establishes a perverse outcome, relative to those not on Schedule 1 and low MCI. Notes Map 77 pg 293 and schedule 1 show streams and tributaries include plantations within catchments that have been previously harvested. Notes high MCI recordings are a regular feature of plantation forest streams. Considers the rule potentially penalises productive forestry in these catchments, despite being compatible with NoF/TAS objectives. Therefore considers the rule is permissive to land use in catchments already below standard, and is contrary to policy objectives.	potential overlap with forestry regulations. Amend to remove perverse outcomes created by rule - remove grams/m3 discharge requirements and utilise mixing protocols only in rural diffuse discharge situations.
S288.066	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity.	Oppose	Notes sedimentation from the clearance of non-plantation forest vegetation is minimal, that larger clearance such as road alignments are minimised due to cost, and that all other non-plantation forest clearance is avoided or minimised under the NZ forest Accord. Considers the rule creates unnecessary overlap, cost and confusion.	Separate vegetation clearance associated with plantation forest activities from general vegetation clearance and incorporate as already regulated in existing plantations under the NES-CF. Remove rule and align requirement with NES-CF 2023. Vegetation clearance for afforestation remains controlled by Council.
S288.067	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land - controlled activity.	Oppose	Notes sedimentation from the clearance of non-plantation forest vegetation is minimal, that larger clearance such as road alignments are minimised due to cost, and that all other non-plantation forest clearance is avoided or minimised under the NZ forest Accord. Considers the rule creates unnecessary overlap, cost and confusion.	Separate vegetation clearance associated with plantation forest activities from general vegetation clearance and incorporate as already regulated in existing plantations under the NES-CF. Remove rule and align requirement with NES-CF 2023. Vegetation clearance for afforestation remains controlled by Council.
S288.068	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance -	Oppose	Notes sedimentation from the clearance of non-plantation forest vegetation is minimal, that larger clearance such as road alignments are minimised due to cost, and that all other non-plantation forest clearance is avoided or minimised under the NZ	Separate vegetation clearance associated with plantation forest activities from general vegetation clearance and incorporate as already regulated in existing plantations under the NES-CF. Remove rule and align requirement with NES-CF 2023.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discretionary activity.		forest Accord. Considers the rule creates unnecessary overlap, cost and confusion.	Vegetation clearance for afforestation remains controlled by Council.
S288.069	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Oppose	Considers the rules subvert the intent of the NES-PF/CF, are not supported by GWRC data, and promulgate uncertainty, delay and cost unquantified benefit. Considers efficacy of the existing regulatory framework under the NES-PC/CF has not been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector and ignored the recommendations of the whaitua committees.	Remove rule and align requirement with NES-CF 2023.
S288.070	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry - discretionary activity.	Oppose	Considers the rules subvert the intent of the NES-PF/CF, are not supported by GWRC data, and promulgate uncertainty, delay and cost unquantified benefit. Notes there may be removal of alternate farm landuse income opportunities for afforesting land to be taken out of farming. Considers efficacy of the existing regulatory framework under the NES-PC/CF has not been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector and ignored the recommendations of the whaitua committees.	Remove rule and align requirement with NES-CF 2023.
S288.071	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.	Oppose	Considers the rules subvert the intent of the NES-PF/CF and are not supported by GWRC data. Considers efficacy of the existing regulatory framework under the NES-PC/CF has not been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the	Remove rule and align requirement with NES-CF 2023.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				forestry sector and ignored the recommendations of the whaitua committees.	
S288.072	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	Considers a 5m minimum setback from surface water bodies from earthworks is contrary to the objectives of the plan. Notes a permissive regime applies to areas under a farm plan and considers this a corollary to the NES-PF/CF. Considers sub-clauses (g) and (h) contradict all other rules, which recognise some discharge will happen.	Align with NES-PF/CF 10m setbacks for perennial streams, set visual discharge standard recognising some discharge always likely to occur. Apply NES-PF/CF inclusive of discharge requirements to forestry, to avoid discriminatory differentiation between land uses.
S288.073	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Oppose	Considers there is a lack of clarity, with potential crossover between policies and rules related to general earthworks and forestry earthworks. Notes there is no provision for emergency works in the earthworks season. Considers the proposed erosion risk method is relative and lacks meaningful accuracy and in-field applicability. Considers a quantitative connection has not been made between forestry activity and actual levels of sedimentation. Considers the need for, and benefit from, added stringency has not been evaluated. Considers the rules contravene the recommendations of the whaitua committees.	Separate earthworks and align with NES-PF/CF.
S288.074	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Oppose	Considers there is a lack of clarity, with potential crossover between policies and rules related to general earthworks and forestry earthworks. Notes there is no provision for emergency works in the earthworks season. Considers the proposed erosion risk method is relative and lacks meaningful accuracy and in-field applicability. Considers a quantitative connection has not been made between forestry activity and actual levels of sedimentation. Considers the need for, and benefit from, added stringency has not been evaluated. Considers the rules contravene the recommendations of the whaitua committees.	Separate earthworks and align with NES-PF/CF.
S288.075	8 Whaitua Te	Rule WH.R26: Farming	Amend	Notes that unlike forestry there is no discharge limit. Notes methods focus on higher erosion land, but ignore that significant sediment generation arises	Review data and rewrite with an objective for consistency in an effects-based rule response.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	activities on a property of between 4 hectares and 20 hectares – permitted activity.		from stock pugging on gentle soils. Considers GWRC data is sparse, however gives insight to possible alignment of sedimentation with national trends, noting that streams with poor TAS included reaches with long exposure to adjacent pastoral and lifestyle farming on gentle terrain. Considers there is inconsistency between land uses and data, and that temporal matters are not taken into account. Considers contaminant generation from a farm is permanent and relative to natural levels elevated, whereas forest land use is elevated during harvesting and roading but rapidly returns to near baseline.	
S288.076	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Amend	Notes that unlike forestry there is no discharge limit. Notes methods focus on higher erosion land, but ignore that significant sediment generation arises from stock pugging on gentle soils. Considers GWRC data is sparse, however gives insight to possible alignment of sedimentation with national trends, noting that streams with poor TAS included reaches with long exposure to adjacent pastoral and lifestyle farming on gentle terrain. Considers there is inconsistency between land uses and data, and that temporal matters are not taken into account. Considers contaminant generation from a farm is permanent and relative to natural levels elevated, whereas forest land use is elevated during harvesting and roading but rapidly returns to near baseline.	Review data and rewrite with an objective for consistency in an effects-based rule response.
S288.077	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers there will be inadequate protection, noting farm plans provide for management options but may not achieve objectives. Considers there will be inadequate protection, noting farm plans provide for management options but may not achieve objectives. Considers there is a disparity in regulatory approach, noting setback requirements for forestry on all perennial streams with discharge	Revisit and align to effects driven approach

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				limits. Considers poor TAS can be attributed to source exposure to lowland pastoral agriculture.	
S288.078	8 Whaitua Te Whanganui-a-Tara	Rule WH.R29: Livestock access to a small river - discretionary activity.	Amend	Considers there will be inadequate protection, noting farm plans provide for management options but may not achieve objectives. Considers there will be inadequate protection, noting farm plans provide for management options but may not achieve objectives. Considers there is a disparity in regulatory approach, noting setback requirements for forestry on all perennial streams with discharge limits. Considers poor TAS can be attributed to source exposure to lowland pastoral agriculture.	Revisit and align to effects driven approach
S288.079	8 Whaitua Te Whanganui-a-Tara	Rule WH.R30: The use of land for farming activities - discretionary activity.	Support	Considers the rule provides for continuation of current activities.	Change and align with objectives of PC1. Allow continuation of activities where permitted standards can not be met, provided river TAS is already compliant. Consider rule sets for activities in TAS compliant streams; OR Adopt an effects-driven approach that is agnostic between land use.
S288.080	8 Whaitua Te Whanganui-a-Tara	Rule WH.R31: Change of rural land use - discretionary activity.	Oppose	Considers the rule contradicts objectives not only to maintain but "improve" water quality. Considers the rule could enable approval of contaminants from land uses up to or beyond TAS thresholds, with little discretion available to assess the margin, or decline in freeboard for a TAS margin. Considers there is conflict with the intent to "improve WQ", and inconsistency with rules that constrain existing activities when TAS targets are already met.	Amend to ensure consistency and neutrality between landuse activities.
S288.081	9 Te Awarua-o-Porirua Whaitua	Objective P.O1: The health of Te Awarua-o-Porirua's groundwater, rivers, lakes,	Amend	Seeks clarification about "Mauri is restored and waters are in a natural state", noting natural character is not a condition fixed in time. Notes climate change may mean natural character is not the same as current targets, which risks legally enforceable unachievable goals.	Include the caveat that natural character refers to a waterbodies state in response to a variety of input conditions that are managed to achieve a level of naturalness.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100.			
S288.082	9 Te Awarua-o-Porirua Whaitua	Objective P.O2: Te Awarua-o-Porirua's groundwater, rivers, lakes and natural wetlands, and their margins are on a trajectory of measurable improvement towards wai ora.	Support	Not stated	Not stated
S288.083	9 Te Awarua-o-Porirua Whaitua	Objective P.O3: The health and wellbeing	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		of coastal water quality, ecosystems and habitats in Pāuatahanui Inlet, Onepoto Arm and the open coastal areas of Te Awarua-o-Porirua is maintained or improved to achieve the coastal water objectives set out in Table 9.1.			
S288.084	9 Te Awarua-o-Porirua Whaitua	Objective P.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		increased, and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classificati on status.			
S288.085	9 Te Awarua-o-Porirua Whaitua	Objective P.O6: Water quality, habitats, water quantity and ecological processes of rivers are maintaine d or improved.	Oppose	Considers the requirement for attribute improvement in all river reaches if TAS is not met in Prt FW management unit monitoring sites does not reflect good management. Considers a failure to meet TAS at a part FMU monitoring site should require identification of the problem source and focus on raising TAS performance in that area. Notes TAS in some sub-catchments may already be met and are not practicably able to be improved.	Adjust to reflect good management.
S288.086	9 Te Awarua-o-Porirua Whaitua	Policy P.P1: Improvem ent of aquatic ecosystem health.	Amend	Regarding (d), considers the term 'land use' is more associated with rural or primary production land uses. Seeks the inclusion of urban land use as it is a major source of contaminants.	Clarify to include urban land use.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S288.087	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	Regarding sub-clause (f), notes the specified activities are already actively managed. Suggests similar amendments can be applied for clause (h), noting 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.	Amend clause (f) to reflect management of specified activities in accordance with established regulatory frameworks and good practice. Consider similar amendments for clause (h).
S288.088	9 Te Awarua-o-Porirua Whaitua	Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Oppose	Considers freshwater action plans should be prepared in partnership with mana whenua and the community.	Amend Policy P.3 as follows: Require Action Plans to be prepared in partnership with mana whenua and the community consultative groups **shall implement the recommendations of the relevant whaitua committees, identifying in detail, the actions, including where relevant, justifiable and effective, additional regulation to achieve the target attribute states as well as other non-regulatory, means to support relevant environmental outcomes.**
S288.089	9 Te Awarua-o-Porirua Whaitua	Policy P.P4: Contaminant load reductions.	Amend	Not stated	Clarify if land use includes urban land use.
S288.090	9 Te Awarua-o-Porirua Whaitua	Policy P.P5: Localised adverse effects of point source discharges.	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S288.091	9 Te Awarua-o-Porirua Whaitua	Policy P.P6: Point source discharges .	Support	Not stated	Not stated
S288.092	9 Te Awarua-o-Porirua Whaitua	Policy P.P8 Avoiding discharges of specific products and waste.	Support	Not stated	Not stated
S288.093	9 Te Awarua-o-Porirua Whaitua	Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Amend	Notes clause (c) does not include temporal matters to be taken into account.	Add a subclause (vi) to account for temporal nature of any discharge.
S288.094	9 Te Awarua-o-Porirua Whaitua	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Oppose	Considers there is confusion between the definitions and their application. Assumes the rules is intended to apply to urban situations and questions if it applies for forestry land use.	Clarify that rule applies to urban and industrial or similar circumstances. Detach from rural land use and remove potential overlap with forestry regulations.
S288.095	9 Te Awarua-	Policy P.P14:	Oppose	Considers there is confusion between the definitions and their application. Assumes the rules is intended	Clarify that rule applies to urban and industrial or similar circumstances. Detach from rural land use and remove

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	Stormwater contaminant offsetting for new greenfield development.		to apply to urban situations and questions if it applies for forestry land use.	potential overlap with forestry regulations.
S288.096	9 Te Awarua-o-Porirua Whaitua	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	Not stated	Amend to provide alternatives. Clarify option for permanent woody vegetation to include exotic tree species, with conditions to provide for alternate economic returns from permanent species.
S288.097	9 Te Awarua-o-Porirua Whaitua	Policy P.P24: Managing rural land use change.	Support	Not stated	Not stated
S288.098	9 Te Awarua-o-Porirua Whaitua	Policy P.P25: Promoting stream shading.	Support	Not stated	Not stated
S288.099	9 Te Awarua-o-Porirua Whaitua	Policy P.P26: Achieving reductions	Oppose	Considers the policy enables rules based on insufficient data, is not aligned with whaitua committee recommendations, and is not supported by Council's data. Considers the rules are not	Remove policy and reset to recognise substantive deficiencies.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		in sediment discharges from plantation forestry.		practicable and imply write-off of larger areas. Concerned that neither the efficacy of the existing regulatory framework under the NES-PF/CF, nor the gains of the proposal, have been adequately identified. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector.	
S288.100	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Oppose	Considers there is confusion between the definitions, policy, general earthworks rules, and forestry earthworks under forestry rules.	Clarify that the policy refers to general earthworks and does not apply to earthworks in forestry. Include new policy covering forestry earthworks and relate to the regulations of the NES-CF separation of earthworks. Objectively assess needs for stringency and utilise NES-CF as intended.
S288.101	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Oppose	Considers the 100g/m3 standard is not related to actual sedimentation levels and is ill-suited to diffuse discharge from land. Notes the measurement method is retrospective rather than real-time. Considers the clarity rule has perverse outcomes, noting that plantation forests often have high macroinvertebrate indices.	Clarify that the policy refers to general earthworks and does not apply to earthworks in forestry.
S288.102	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose	Notes forestry continuously supplies feedstock for industry and markets and cannot be stopped. Notes earthworks are programmed to be done mainly over summer and drier periods, however the policy makes no provision, continuity, nor emergency and maintenance.	Clarify that general earthworks do not apply to forestry. Earthworks for forestry to be to be undertaken under NES-CF.
S288.103	9 Te Awarua-o-Porirua Whaitua	Rule P.R1: Point source discharges of specific contaminants - prohibited activity.	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S288.104	9 Te Awarua-o-Porirua Whaitua	Rule P.R2: Stormwater to land - permitted activity.	Amend	Notes no threshold is provided for sub-clause (d) and that it is unrealistic. Notes there may be "exacerbation" of flooding to a downslope property is rainfall intensity is severe enough.	Amend to include threshold or other text to recognise high intensity, rainfall events.
S288.105	9 Te Awarua-o-Porirua Whaitua	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Oppose	Considers there is confusion between the definitions and their application. Assumes the rules is intended to apply to urban situations and questions if it applies for forestry land use. Considers the 50 g/m3 threshold for Schedule F1 streams or those with high MCI establishes a perverse outcome, relative to those not on Schedule 1 and low MCI. Notes Map 77 pg 293 and schedule 1 show streams and tributaries that include plantations within catchments that have been previously harvested. Notes high MCI recordings are a regular feature of plantation forest streams. Considers the rule potentially penalises productive forestry in these catchments, despite being compatible with NoF/TAS objectives. Considers the rule is permissive to land use in catchments already below standard, and is contrary to policy objectives.	Clarify that rule applies to urban and industrial or similar circumstances. Detach from rural land use and remove potential overlap with forestry regulations. Amend to remove perverse outcomes created by rule - remove grams/m3 discharge requirements and utilise mixing protocols only in rural diffuse discharge situations.
S288.106	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Oppose	Considers there is confusion between the definitions and their application. Assumes the rules is intended to apply to urban situations and questions if it applies for forestry land use. Considers the 50 g/m3 threshold for Schedule F1 streams or those with high MCI establishes a perverse outcome, relative to those not on Schedule 1 and low MCI. Notes Map 77 pg 293 and schedule 1 show streams and tributaries that include plantations within catchments that have been previously harvested. Notes high MCI recordings are a regular feature of plantation forest streams. Considers the rule potentially penalises productive forestry in these catchments, despite being compatible with NoF/TAS objectives. Considers the rule is permissive to land use in	Clarify that rule applies to urban and industrial or similar circumstances. Detach from rural land use and remove potential overlap with forestry regulations. Amend to remove perverse outcomes created by rule - remove grams/m3 discharge requirements and utilise mixing protocols only in rural diffuse discharge situations.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				catchments already below standard, and is contrary to policy objectives.	
S288.107	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Oppose	Considers there is confusion between the definitions and their application. Assumes the rules is intended to apply to urban situations and questions if it applies for forestry land use. Considers the 50 g/m3 threshold for Schedule F1 streams or those with high MCI establishes a perverse outcome, relative to those not on Schedule 1 and low MCI. Notes Map 77 pg 293 and schedule 1 show streams and tributaries that include plantations within catchments that have been previously harvested. Notes high MCI recordings are a regular feature of plantation forest streams. Considers the rule potentially penalises productive forestry in these catchments, despite being compatible with NoF/TAS objectives. Considers the rule is permissive to land use in catchments already below standard, and is contrary to policy objectives.	Clarify that rule applies to urban and industrial or similar circumstances. Detach from rural land use and remove potential overlap with forestry regulations. Amend to remove perverse outcomes created by rule - remove grams/m3 discharge requirements and utilise mixing protocols only in rural diffuse discharge situations.
S288.108	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Oppose	Considers there is confusion between the definitions and their application. Assumes the rules is intended to apply to urban situations and questions if it applies for forestry land use. Considers the 50 g/m3 threshold for Schedule F1 streams or those with high MCI establishes a perverse outcome, relative to those not on Schedule 1 and low MCI. Notes Map 77 pg 293 and schedule 1 show streams and tributaries that include plantations within catchments that have been previously harvested. Notes high MCI recordings are a regular feature of plantation forest streams. Considers the rule potentially penalises productive forestry in these catchments, despite being compatible with NoF/TAS objectives. Considers the rule is permissive to land use in catchments already below standard, and is contrary to policy objectives.	Clarify that rule applies to urban and industrial or similar circumstances. Detach from rural land use and remove potential overlap with forestry regulations. Amend to remove perverse outcomes created by rule - remove grams/m3 discharge requirements and utilise mixing protocols only in rural diffuse discharge situations.
S288.109	9 Te Awarua-	Rule P.R12 -	Oppose	Considers there is confusion between the definitions and their application. Assumes the rules is intended	Clarify that rule applies to urban and industrial or similar circumstances. Detach from rural land use and remove

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	Stormwater discharges from new unplanned greenfield development - prohibited activity.		to apply to urban situations and questions if it applies for forestry land use. Considers the 50 g/m3 threshold for Schedule F1 streams or those with high MCI establishes a perverse outcome, relative to those not on Schedule 1 and low MCI. Notes Map 77 pg 293 and schedule 1 show streams and tributaries that include plantations within catchments that have been previously harvested. Notes high MCI recordings are a regular feature of plantation forest streams. Considers the rule potentially penalises productive forestry in these catchments, despite being compatible with NoF/TAS objectives. Considers the rule is permissive to land use in catchments already below standard, and is contrary to policy objectives.	potential overlap with forestry regulations. Amend to remove perverse outcomes created by rule - remove grams/m3 discharge requirements and utilise mixing protocols only in rural diffuse discharge situations.
S288.110	9 Te Awarua-o-Porirua Whaitua	Rule P.R16: Vegetation clearance on highest erosion risk land- permitted activity.	Oppose	Notes sedimentation from the clearance of non-plantation forest vegetation is minimal, that larger clearance such as road alignments are minimised due to cost, and that all other non-plantation forest clearance is avoided or minimised under the NZ forest Accord. Considers the rule creates unnecessary overlap, cost and confusion.	Separate vegetation clearance associated with plantation forest activities from general vegetation clearance and incorporate as already regulated in existing plantations under the NES-CF. Remove rule and align requirement with NES-CF 2023. Vegetation clearance for afforestation remains controlled by Council.
S288.111	9 Te Awarua-o-Porirua Whaitua	Rule P.R17: Vegetation clearance on highest erosion risk land - controlled activity.	Oppose	Notes sedimentation from the clearance of non-plantation forest vegetation is minimal, that larger clearance such as road alignments are minimised due to cost, and that all other non-plantation forest clearance is avoided or minimised under the NZ forest Accord. Considers the rule creates unnecessary overlap, cost and confusion.	Separate vegetation clearance associated with plantation forest activities from general vegetation clearance and incorporate as already regulated in existing plantations under the NES-CF. Remove rule and align requirement with NES-CF 2023. Vegetation clearance for afforestation remains controlled by Council.
S288.112	9 Te Awarua-o-Porirua Whaitua	Rule P.R18: Vegetation clearance -	Oppose	Notes sedimentation from the clearance of non-plantation forest vegetation is minimal, that larger clearance such as road alignments are minimised due to cost, and that all other non-plantation forest clearance is avoided or minimised under the NZ	Separate vegetation clearance associated with plantation forest activities from general vegetation clearance and incorporate as already regulated in existing plantations under the NES-CF. Remove rule and align requirement with NES-CF 2023.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discretionary activity.		forest Accord. Considers the rule creates unnecessary overlap, cost and confusion.	Vegetation clearance for afforestation remains controlled by Council.
S288.113	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry - controlled activity.	Oppose	Considers the rules subvert the intent of the NES-PF/CF and are not supported by GWRC data. Considers efficacy of the existing regulatory framework under the NES-PC/CF has not been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector and ignored the recommendations of the whaitua committees.	Remove rule and align requirement with NES-CF 2023.
S288.114	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry - discretionary activity.	Oppose	Considers the rules subvert the intent of the NES-PF/CF, are not supported by GWRC data, and promulgate uncertainty, delay and cost unquantified benefit. Notes there may be removal of alternate farm landuse income opportunities for afforesting land to be taken out of farming. Considers efficacy of the existing regulatory framework under the NES-PC/CF has not been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector and ignored the recommendations of the whaitua committees.	Remove rule and align requirement with NES-CF 2023.
S288.115	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity.	Oppose	Considers the rules subvert the intent of the NES-PF/CF and are not supported by GWRC data. Considers efficacy of the existing regulatory framework under the NES-PC/CF has not been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the	Remove rule and align requirement with NES-CF 2023.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				forestry sector and ignored the recommendations of the whaitua committees.	
S288.116	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Amend	Considers a 5m minimum setback from surface water bodies from earthworks is contrary to the objectives of the plan. Notes a permissive regime applies to areas under a farm plan and considers this a corollary to the NES-PF/CF. Considers clauses (g) and (h) contradict all other rules, which recognise some discharge will happen.	Align with NES-PF/CF 10m setbacks for perennial streams, set visual discharge standard recognising some discharge always likely to occur. Apply NES-PF/CF inclusive of discharge requirements to forestry, to avoid discriminatory differentiation between land uses.
S288.117	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks - non-complying activity.	Oppose	Considers there is a lack of clarity, with potential crossover between policies and rules related to general earthworks and forestry earthworks. Notes there is no provision for emergency works in the earthworks season. Considers the proposed erosion risk method is relative and lacks meaningful accuracy and in-field applicability. Considers a quantitative connection has not been made between forestry activity and actual levels of sedimentation. Considers the need for, and benefit from, added stringency has not been evaluated. Considers the rules contravene the recommendations of the whaitua committees.	Separate earthworks and align with NES-PF/CF.
S288.118	9 Te Awarua-o-Porirua Whaitua	Rule P.R25: Farming activities on properties of between 4 hectares and 20 hectares - permitted activity.	Oppose	Notes there is no discharge limit as there is for forestry. Notes methods focus on higher erosion land, but ignore that significant sediment generation arises from stock pugging on gentle soils. Considers GWRC data is sparse, however gives insight to possible alignment of sedimentation with national trends, noting that streams with poor TAS included reaches with long exposure to adjacent pastoral and lifestyle farming on gentle terrain. Considers there is inconsistency between land uses and data, and that temporal matters are not taken into account. Considers contaminant generation from a farm is permanent and relative to natural levels elevated, whereas forest land use is elevated during harvesting and roading but rapidly returns to near baseline.	Review data and rewrite with an objective for consistency in an effects-based rule response.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S288.119	9 Te Awarua-o-Porirua Whaitua	Rule P.R26: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Notes there is no discharge limit as there is for forestry. Notes methods focus on higher erosion land, but ignore that significant sediment generation arises from stock pugging on gentle soils. Considers GWRC data is sparse, however gives insight to possible alignment of sedimentation with national trends, noting that streams with poor TAS included reaches with long exposure to adjacent pastoral and lifestyle farming on gentle terrain. Considers there is inconsistency between land uses and data, and that temporal matters are not taken into account. Considers contaminant generation from a farm is permanent and relative to natural levels elevated, whereas forest land use is elevated during harvesting and roading but rapidly returns to near baseline.	Review data and rewrite with an objective for consistency in an effects-based rule response.
S288.120	9 Te Awarua-o-Porirua Whaitua	Rule P.R28: Change of rural land use - discretionary activity.	Oppose	Considers the rule contradicts objectives not only to maintain but "improve" water quality. Considers the rule could enable approval of contaminants from land uses up to or beyond TAS thresholds, with little discretion available to assess the margin, or decline in freeboard for a TAS margin. Considers there is conflict with the intent to "improve WQ", and inconsistency with rules that constrain existing activities when TAS targets are already met.	Amend to ensure consistency and neutrality between landuse activities.
S288.121	12 Schedules	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Oppose	Not stated	Separate out non-plantation vegetation clearance associated with plantation forest activities. Remove requirement and align with NES-CF for non-plantation vegetation clearance.
S288.122	12 Schedules	Schedule 34: Plantation Forestry	Oppose	Considers there is overlap with NES-CF, which creates confusion and adds little value.	Remove and align and incorporate to NES-CF

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Erosion and Sediment Management Plan.			
S288.123	9 Te Awarua-o-Porirua Whaitua	Rule P.R27: The use of land for farming activities – discretionary activity.	Oppose	Effectively provides for continuation of current activities subject to efforts to meet good practice even if unable to meet the permitted activity standards so long as NoF TAS attributes already met in sub-catchment.	Change and align with objectives of PC1. Accept when good practice permitted standards cannot be met and allow continuation of activity provided river TAS already compliant. Highlight discrepancy in approach to different land use. GWRC data indicating NoF/TAS being met in some catchments where forestry activity undertaken for years with limited likelihood of future increases in intensity or expansion.

S041 Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S41.001	2 Interpretation	Earthworks	Amend	Supports the use of the National Planning Standards definition in principle but seeks exemptions for infrastructure from the Operative Natural Resources Plan definition are carried over into the relevant rules.	Retain definition as notified and amend relevant rules to exempt infrastructure.
S41.002	8 Whaitua Te Whanganui-a-Tara	Rule WH.R31: Change of rural land use - discretionary activity.	Oppose	This policy is linked to a rule which makes earthworks between June and September a non-complying activity. Telecommunications works are carried out year-round. Considers having to apply for consents to undertake these activities in this period will add significant costs and delays in the provision of telecommunication facilities. Concerned adverse weather in summer/autumn may result in significant lost time to safely undertake earthworks, and the winter period may be needed for projects to catch up on progress and stabilise the land.	Delete policy: ~~Policy WH.P31: Winter shut down of earthworks~~ ~~Earthworks over 3,000m2 in area shall:~~ ~~(a) be shut down from 1st June to 30th September each year, and~~ ~~(b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers any winter earthworks are dealt with through conditions of consent.	
S41.003	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Seeks an exemption from this rule for telecommunications facilities as it would be impractical in most situations to provide any form of hydrological controls around new or upgraded telecommunications facilities. Concern that in most cases there would be no room to install hydrological controls for telecommunication facilities within the road reserve and where leasehold agreements are arranged to establish facilities on private properties, facilities are often placed near the boundary which limits the ability to choose a location within a property where stormwater controls could be put in place. Considers increased footprint required would increase the costs of leases and affect the quantity and location of the site used for the facility and where hydrological controls can be provided the costs of compliance with this rule would add significantly to the provision of telecommunications infrastructure.	Amend rule as follows: Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or new local authority stormwater network, that is not a high risk industrial or trade premise or unplanned greenfield development, is a permitted activity, provided the following conditions are met: (...) Note This rule excludes new and upgraded telecommunications facilities. Where a property connects to a local authority stormwater network, additional connection requirements and authorisations may be required by the network utility operator. For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to Rule WH.R11.
S41.004	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	Supports in principle the earthworks definition aligning with the National Planning Standards but notes this removes existing exemptions for telco infrastructure. States that telecommunication earthworks can easily exceed 3000sqm in 12 months due to their linear nature, but that the telco industry follows industry standard best practice for earthworks and these earthworks are low impact. Considers these activities should be exempt to remove the need to apply for unnecessary consents	Amend rule as follows: Rule WH.R23: Earthworks - permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, ~~and~~ or (c) the area of earthworks does not exceed 3,000m2 per

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				which will add significant costs and delays and seeks an exclusion in the rule itself to comply with the National Planning Standards. Suggests the 'and' after clause b means that any earthworks that are not related to farming activities require consent no matter how small but that this is most likely an error in how the rule is drafted and should be corrected.	property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note This rule excludes: • thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance; and • the construction, repair, upgrade or maintenance of telecommunication structures or lines. Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).
S41.005	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	This rule makes earthworks between June and September a non-complying activity. Telecommunications works are carried out year-round. Considers having to apply for consents to undertake these activities in this period will add significant costs and delays in the provision of telecommunication facilities. Concerned adverse weather in summer/autumn	Amend rule as follows: Rule WH.R24: Earthworks - restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				may result in significant lost time to safely undertake earthworks, and the winter period may be needed for projects to catch up on progress and stabilise the land. Considers any winter earthworks are dealt with through conditions of consent.	discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year.
S41.006	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose	This policy is linked to a rule which makes earthworks between June and September a non-complying activity. Telecommunications works are carried out year-round. Considers having to apply for consents to undertake these activities in this period will add significant costs and delays in the provision of telecommunication facilities. Concerned adverse weather in summer/autumn may result in significant lost time to safely undertake earthworks, and the winter period may be needed for projects to catch up on progress and stabilise the land. Considers any winter earthworks are dealt with through conditions of consent.	Delete policy: ~~Policy P.P29: Winter shut down of earthworks~~ ~~Earthworks over 3,000m2 in area shall:~~ ~~(a) be shut down from 1st June to 30th September each year, and~~ ~~(b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).~~
S41.007	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Seeks an exemption from this rule for telecommunications facilities as it would be impractical in most situations to provide any form of hydrological controls around new or upgraded telecommunications facilities. Concern that in most cases there would be no room to install hydrological controls for telecommunication facilities within the road reserve and where leasehold agreements are arranged to establish facilities on private properties, facilities are often placed near the boundary which limits the ability to choose a location within a property where stormwater controls could be put in	Amend rule as follows: Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or new local authority stormwater network, that is not a high risk industrial or trade

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				place. Considers increased footprint required would increase the costs of leases and affect the quantity and location of the site used for the facility and where hydrological controls can be provided the costs of compliance with this rule would add significantly to the provision of telecommunications infrastructure.	premise or unplanned greenfield development, is a permitted activity, provided the following conditions are met: (...) Note This rule excludes new and upgraded telecommunications facilities. Where a property connects to a local authority stormwater network, additional connection requirements and authorisations may be required by the network utility operator. For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to Rule P.R10.
S41.008	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Amend	Supports in principle the earthworks definition aligning with the National Planning Standards but notes this removes existing exemptions for telco infrastructure. States that telecommunication earthworks can easily exceed 3000sqm in 12 months due to their linear nature, but that the telco industry follows industry standard best practice for earthworks and these earthworks are low impact. Considers these activities should be exempt to remove the need to apply for unnecessary consents which will add significant costs and delays and seeks an exclusion in the rule itself to comply with the National Planning Standards. Suggests the 'and' after clause b means that any earthworks that are not related to farming activities require consent no matter how small but that this is most likely an error in how the rule is drafted and should be corrected.	Amend rule as follows: Rule P.R22: Earthworks - permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, ~~and~~ or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note This rule excludes: -thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance; and -the construction, repair, upgrade or maintenance of telecommunication structures or lines. Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).
S41.009	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Amend	This rule makes earthworks between June and September a non-complying activity. Telecommunications works are carried out year-round. Considers having to apply for consents to undertake these activities in this period will add significant costs and delays in the provision of telecommunication facilities. Concerned adverse weather in summer/autumn may result in significant lost time to safely undertake earthworks, and the winter period may be needed for projects to catch up on progress and stabilise the land. Considers any winter earthworks are dealt with through conditions of consent.	Amend rule as follows: Rule P.R23: Earthworks - restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year.

S104 Chris and Gwen Bossley

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S104.001	2 Interpretation	Afforestation	Oppose	Supports the New Zealand Farm Forestry Association Inc, and the Wellington Branch of the New Zealand Farm Forestry Associations' submission.	No decision requested but opposes the plan change.

S026 Christine Stanley

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S26.001	General comments	General comments - water bodies	Support	Supports the intent of improving water quality and ecological health objectives within Te Awarua-o-Porirua harbour	Not stated
S26.002	General comments	General comments - maps	Amend	Concerns with map quality and ability to identify properties sites and marks on individual properties.	Provide better quality maps.
S26.003	General comments	General comments - overall	Not Stated	Concerns with the ability of PC1 to achieve the desired outcomes	Not stated
S26.004	General comments	General comments - overall	Not Stated	Concerns with GWRC's ability to monitor, manage or respond to pollution	Not stated
S26.005	General comments	General comments - economic cost/impact	Not Stated	Concerned costs of implementing PC1 will reduce the ability of landowners to invest in improvements for water quality and that better outcomes would be achieved by encouraging and rewarding good land management.	Not stated
S26.006	General comments	General comments - overall	Not Stated	Concerned about how titles which are part of rotational grazing or regenerative farming will be interpreted when completing the registration forms for farms smaller than 4 hectares	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S26.007	General comments	General comments - overall	Amend	Supports Porirua City Council's submissions regarding the need for a digital format similar to those of ePlans. Recommends converting the format to improve efficiency, regulatory compliance and reduced costs for users.	Convert to eplan format
S26.008	General comments	General comments - maps	Amend	Concerns with map quality and ability to identify properties	Amend Maps
S26.009	2 Interpretation	Earthworks	Amend	Amend to allow gardening, cultivation and fence maintenance, to avoid unintended interpretation.	Amend 2.2: Earthworks - to allow gardening, cultivation and fence maintenance, to avoid unintended interpretation.
S26.010	2 Interpretation	Impervious surfaces	Not Stated	Concerned that specifications regarding impervious surface water collection into tanks is not included in costing assessments in the s32 report.	Delete impervious surfaces definition
S26.011	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Amend	Support M44 in principle but seeks timeframes and methodology. Suggests method should provide for engagement with small landowners by a certain date.	Amend Method M44
S26.012	9 Te Awarua-o-Porirua Whaitua	Objective P.O1: The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is	Amend	Not stated	Amend Objective P.O1 to include 'Mauri is restored and waters restored to a natural state where possible'

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		progressively improved and is wai ora by 2100.			
S26.013	9 Te Awarua-o-Porirua Whaitua	Objective P.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Pāuatahanui Inlet, Onepoto Arm and the open coastal areas of Te Awarua-o-Porirua is maintained or improved to achieve the coastal water objectives set out in Table 9.1.	Amend	Concerns with costs of upgrading wastewater network to achieve objective	Amend P.O3 (f) and table 9.1 to include a timeframe of 'by 2060'
S26.014	9 Te Awarua-	Table 9.1: Coastal	Amend	Concerns with costs of upgrading wastewater network to achieve objective	Amend P.O3 (f) and table 9.1 to include a timeframe of 'by 2060'

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	water objectives.			
S26.015	9 Te Awarua-o-Porirua Whaitua	Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Amend	Prefers a collaborative approach to a regulatory approach	Amend Policy P.P.3. so it is more collaborative
S26.016	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Not Stated	Earthwork provisions do not allow for stabilisation and access track maintenance between June-September	Delete P.P29
S26.017	9 Te Awarua-o-Porirua Whaitua	Rule P.R16: Vegetation clearance on highest erosion risk land-permitted activity.	Amend	Seeks definition of pest plants	Include definition of pest plants
S26.018	9 Te Awarua-o-Porirua Whaitua	Rule P.R27: The use of land for farming activities - discretionary activity.	Oppose	Does not allow for individual property uses	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S26.019	13 Maps	Map 86: Unplanned greenfield areas - Porirua City Council.	Amend	Inconsistent with Porirua District Plan	Amend Map 86 - so it is consistent with Porirua District Plan

S285 Civil Contractors New Zealand

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S285.001	General comments	General comments - economic cost/impact	Not Stated	Considers PC1 will have significant impacts on the region's civil construction industry, will result in increased costs for ratepayers, and is unlikely to result in better environmental or consenting outcomes.	Not stated
S285.002	General comments	General comments - earthworks	Not Stated	Notes that in relation to new regulations around vegetation clearance (for instance Rule WH.R18), engagement should be undertaken with the industry so contractors can adequately understand their responsibilities around sediment control while working on vegetation clearance sites. Advises it is unwise to include an impassable threshold in any standard, because at a point in time, rainfall events or unanticipated weather will throw this measure out. For instance, at certain points in time (for instance flooding) no site would comply even if there was no discharge from the site itself, so no work would be able to meet this term in consent. Considers it is better to include specific numbers in the guidance on how the standards set by the Natural Resources Plan are implanted on work sites, rather than in the Natural Resources Plan	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				itself.	
S285.003	General comments	General comments - earthworks	Not Stated	Notes the region is currently experiencing a major shortage of available cleanfill disposal sites, with a single significant site left in Wellington near the Southern Landfill, and this is escalating project costs. Appreciates sediment control is an important factor when planning land use for cleanfill sites.	GWRC provide clarity about appropriate locations and conditions for cleanfill sites
S285.004	2 Interpretation	Containment standard	Support	Not stated	Retain as drafted, or ensure that any changes preserve the approach of: 1) referring to each discharge location, rather than the whole network, and 2) assessing compliance by reference to average annual weather conditions (as simulated by a computer model) rather than by reference to the actual number of wet weather overflow events in a given year.
S285.005	2 Interpretation	Dry weather discharges	Amend	Not stated	Revise definition as follows: Constructed or uncontrolled discharges of wastewater from a wastewater network or stormwater network that are not attributable to wet occur during dry weather, often generally as a result of pipe blockage, pipe breakage, cross-connections in the publicly-owned network or mechanical or power failure, in a network during periods of dry weather.
S285.006	2 Interpretation	Earthworks	Amend	Considers the definition needs refinement as it will require considerable resource from industry to understand and implement, may escalate project costs, and result in worse outcomes and impact the ability for transport and water infrastructure networks to be repaired or maintained efficiently Considers the new definition for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua is not needed, as it applies the term too broadly. Considers the addition of 'to a cleanfill area' to 2.2 (i) is problematic as there are constraints around sites in the region at the moment and the availability of cleanfill sites needs to be taken into account as this could hamper the ability to deliver	Reinstate NRP definition of earthworks. Remove 'to a cleanfill area' from the point in definition for 'all other whaitua'.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				infrastructure projects. Notes the definition may result in consent applications being required for minor pipe or road repairs.	
S285.007	2 Interpretation	Existing wastewater discharge	Support	Not stated	Not stated
S285.008	2 Interpretation	Impervious surfaces	Amend	Not stated	Amend definition as follows: Replace the reference to "stormwater" with 'rainfall', 'water', 'precipitation', or similar. Review and refine the list of exclusions in light of their implications for the rules. Refer to aggregate rather than metal. Remove duplicate references to 'porous or permeable paving'. Reconsider the reference to "reuse" which should be for 'non-potable purposes' to align with RPS language rather than 'grey water'. Reconsider the final two bullet points which have different approaches to permanent plumbing and use different terms for the same outcome (non-potable water use).
S285.009	2 Interpretation	Primary contact sites	Amend	Considers the definition adds unnecessary complication by separating these from the coastal recreation sites.	Combine the primary contact sites with the Schedule H recreation sites.
S285.010	2 Interpretation	Stormwater treatment system	Amend	Considers clarity is provided by deleting 'green infrastructure' which has no official defined meaning, and referring to 'contamination in stormwater' rather than stormwater contaminants.	Delete reference to 'green infrastructure'. Refer to 'contamination in stormwater', rather than 'stormwater contaminants.'
S285.011	2 Interpretation	Wet weather overflows	Amend	Generally supports definition but suggests either the definition or the associated rules should distinguish between private and public networks.	Amend this definition or associated rules to distinguish between private and public networks.
S285.012	3 Objectives	Objective O2	Support	Supports Wellington Water's submission that this should be retained as these benefits should be recognised regardless of the location	Retain the application of O2 in all locations.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S285.013	5.4 Beds of lakes and rivers	Beds of lakes and rivers general conditions.	Amend	Considers urgent works may not be able to wait for an ecologists assessment and clause (n) may lead to poor environmental outcomes.	Provide more certainty to plan users in general condition (n) so that a third party is not required to assess when named birds are identified as nesting, roosting and foraging, at the work site.
S285.014	5.4 Beds of lakes and rivers	Rule R128: New structures - permitted activity.	Amend	Notes that inclusion of 'pipeline' excludes 'pipes' from this Rule as they have different dictionary definitions. Considers that pipes should be specifically mentioned.	Refer to both pipes and pipelines.
S285.015	6 Other methods	Method M43: Supporting the health of urban waterbodies.	Amend	Notes the reference to Wellington Water Limited may not be appropriate in the future (or in all locations) and should be updated to ensure it remains relevant. Considers a range of options should be provided for hydrological controls and confirmation should be provided on the state of the environment monitoring and modelling that Greater Wellington will be undertaking.	Retain method with amendments. The reference to Wellington Water Limited should be removed and replaced with 'relevant water utility operator' or 'territorial authorities' 'water controlling authority' or similar. Remove reference to incentivising and research and development by other parties. Provide further options than tanks for hydrological controls.
S285.016	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Oppose	Suspended fine sediment/deposited fine sediment Notes there is uncertainty regarding the modelled correlation between sediment loads and visual clarity and SedNet is a national scale model which has had to be adjusted to the scale of the target TAS locations. Considers increased granularity may lead to higher levels of uncertainty. Furthermore, sediment loads, visual clarity and deposited sediment are influenced by factors within catchments outside of WWL's control including human land uses and activities and natural factors.	Visual clarity and deposited sediment need to be set taking into consideration all contributing sediment sources, and the following points also need to be addressed: 1. How sediment load reductions will be measured in the future 2. How would proportionate contribution to sediment be measured and any reduction in this contribution be measured 3. How much time would the testing take, and who would a 'suitable person' be to conduct the testing? If we do not currently have personnel capacity to conduct this testing, is it wise to write it into the Plan?
S285.017	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		earthworks.			
S285.018	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Oppose	Notes test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.	Amend to either specify which sort of test is used and leave this to implementation guidance, or refer to the correct on-site test method (NTU).
S285.019	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose	Seeks clarification on whether this clause stops all jobs in winter. Considers a 'hard shutdown' over winter will render civil construction and earthmoving companies unable to retain staff and increase project costs significantly. Considers the plan change does not take into account differences in material worked or terrain and that some winter works must be allowed via resource consents or some other avenue, if the site meets certain criteria. Notes some jobs (sand jobs) have much less sediment and runoff in rainfall and winter is actually a better time for these jobs to run, as there is less dust.	Delete policy WH.P31 If amended, ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'
S285.020	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an existing high risk industrial	Amend	Considers that (f) and (g) should not be occurring even if they are via the stormwater network and that it is the landowners responsibility to resolve.	Amend Rule as follows: ...~~and where the discharge is not via an existing local authority stormwater network the discharge shall also not:~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		or trade premise - permitted activity.			
S285.021	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Considers clause (c) is too vague as it does not specify what the hydrological controls have to achieve. Considers that (f) and (g) should not be occurring even if they are via the stormwater network and that it is the landowners responsibility to resolve.	Greater specificity in clause (c), including a requirement to retain a specific depth of rainfall. Delete the following clause: ~~and where the discharge is not via an existing local authority stormwater network the discharge shall also not:~~
S285.022	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land - controlled activity.	Support	Supports good sediment control, but suggests engagement with contractors responsible for vegetation clearance should be undertaken by GWRC to clarify their responsibilities under the new plan. GWRC should work with industry bodies to compose and circulate good information on how to prepare sediment control plans.	Not stated
S285.023	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance - discretionary activity.	Not Stated	Supports good sediment control, but suggests engagement with contractors responsible for vegetation clearance should be undertaken by GWRC to clarify their responsibilities under the new plan. GWRC should work with industry bodies to compose and circulate good information on how to prepare sediment control plans.	Not stated
S285.024	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	Notes that many earthworks activities undertaken by contractors working for local authority transport teams and Waka Kotahi have significant public benefits would be unable to met the permitted activity conditions of proposed Rule WH.R23, inclusive of minor repairs and maintenance of three	Amend Rule WH.R23 to reinstate the exemptions for certain earthworks activities as exist for 'other Whaitua', including for the thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines. Any consequential amendments, to other relevant

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				waters infrastructure. Notes that a burst pipe may require resource consent as a restricted discretionary activity under Rule WH.R24 and this could lead to hundreds of resource consent applications per annum for minor earthworks activities. Concerns about capacity to perform this work.	provisions, which are in general accordance with this request.
S285.025	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	Strongly opposes and considers the shutdown of earthworks between 1 June and 30 September is inappropriate as works may be able to be managed during this period with no adverse effects. Notes test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.	Amend policy WH.R24 (b) If amended, ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'. Amend to either specify which sort of test is used and leave this to implementation guidance, or refer to the correct on-site test method (NTU).
S285.026	8 Whaitua Te Whanganui-a-Tara	Rule WH.R33: Take and use of water in the Whaitua Te Whanganui-a Tara - restricted	Amend	Considers amendments required to better allow for water take in relation to dust control, emergency works and other civil construction activities.	Amend to consider use of standpipes, water use on infrastructure projects and emergency water take

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discretionary activity.			
S285.027	8 Whaitua Te Whanganui-a-Tara	Rule WH.R34: Take and use of water in the Whaitua Te Whanganui-a-Tara - discretionary activity.	Not Stated	Considers amendments required to better allow for water take in relation to dust control, emergency works and other civil construction activities.	Amend to consider use of standpipes, water use on infrastructure projects and emergency water take
S285.028	8 Whaitua Te Whanganui-a-Tara	Rule WH.R35: Take and use of water from outstanding rivers or lakes - non-complying activity.	Not Stated	Considers amendments required to better allow for water take in relation to dust control, emergency works and other civil construction activities.	Amend to consider use of standpipes, water use on infrastructure projects and emergency water take
S285.029	8 Whaitua Te Whanganui-a-Tara	Rule WH.R36: Take and use of water exceeding minimum flows or core allocation - prohibited activity.	Not Stated	Considers amendments required to better allow for water take in relation to dust control, emergency works and other civil construction activities.	Amend to consider use of standpipes, water use on infrastructure projects and emergency water take

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S285.030	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Not Stated	Strongly opposes and considers the shutdown of earthworks between 1 June and 30 September is inappropriate as works may be able to be managed during this period with no adverse effects. Notes test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.	Amend to either specify which sort of test is used and leave this to implementation guidance, or refer to the correct on-site test method (NTU).
S285.031	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Amend	Considers a hard shutdown of earthworks between 1 June and 30 September is inappropriate as many works may be able to be managed during this period with no adverse effects.	Amend policy P.P29 (a) If amended, ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'.
S285.032	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Not Stated	Notes that many earthworks activities undertaken by contractors working for local authority transport teams and Waka Kotahi have significant public benefits but would be unable to met the permitted activity conditions of proposed Rule WH.R23, inclusive of minor repairs and maintenance of three waters infrastructure. Notes that a burst pipe may require resource consent as a restricted discretionary activity under Rule WH.R24 and this could lead to hundreds of resource consent applications per annum for minor	Amend the definition of earthworks that governs Rule P.R22, to reinstate the exemptions for certain earthworks activities as exist for 'other Whaitua', including for the thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines. Any consequential amendments, to other relevant provisions, which are in general accordance with this request.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				earthworks activities. Concerns about capacity to perform this work.	
S285.033	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Not Stated	Strongly opposes and considers the shutdown of earthworks between 1 June and 30 September is inappropriate as works may be managed during this period with no adverse effects. Notes test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.	Amend policy P.R23 (b), ~~which is excessive.~~ If amended, ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'. Amend to either specify which sort of test is used and leave this to implementation guidance, or refer to the correct on-site test method (NTU).
S285.034	9 Te Awarua-o-Porirua Whaitua	Rule P.R30: Take and use of water - permitted activity.	Not Stated	Considers amendments required to better allow for water take in relation to dust control, emergency works and other civil construction activities.	Amend to consider use of standpipes, water use on infrastructure projects and emergency water take
S285.035	9 Te Awarua-o-Porirua Whaitua	Rule P.R31: Take and use of water - restricted discretionary activity.	Not Stated	Considers amendments required to better allow for water take in relation to dust control, emergency works and other civil construction activities.	Amend to consider use of standpipes, water use on infrastructure projects and emergency water take

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S285.036	9 Te Awarua-o-Porirua Whaitua	Rule P.R32: Take and use of water - discretionary activity.	Not Stated	Considers amendments required to better allow for water take in relation to dust control, emergency works and other civil construction activities.	Amend to consider use of standpipes, water use on infrastructure projects and emergency water take
S285.037	9 Te Awarua-o-Porirua Whaitua	Rule P.R33: Taking and use of water that exceeds minimum flows or allocation amounts - prohibited activity.	Not Stated	Considers amendments required to better allow for water take in relation to dust control, emergency works and other civil construction activities.	Amend to consider use of standpipes, water use on infrastructure projects and emergency water take

S277 Craig Innes

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S277.001	General comments	General comments - overall	Oppose	Considers the plan change is inaccessible, difficult to read, and the maps are unclear. Considers the document is difficult to read and is not fit for purpose. Concerned the connections between the policies and the geographic areas are inadequate.	Not stated.
S277.002	General comments	General comments - maps	Oppose	Concerned the map system used in Change 1 is not fit for purpose, and streams that have been individually listed in the schedule were merged together in the GIS data. Considers identifying streams by coordinates is an inappropriate level of identification, and each stream should have been	Not stated.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				shown on a map and identified with reference to features that the reader could identify. Considers the document is difficult to read and is not fit for purpose. Concerned the connections between the policies and the geographic areas are inadequate.	
S277.003	General comments	General comments - water bodies	Oppose	The submitter seeks clarity about whether the stream at the rear of their property is listed in the schedule and what wildlife has been identified for this stream. Notes the stream is subject to multiple water control features associated with urban development. Requests that GWRC note that there is no natural passage for fish on the stream.	Not stated.
S277.004	General comments	General comments - water bodies	Oppose	Objects to the description of Wainuiomata-iti Stream (Wainuiomata Stream). Considers the waterway needs to be described by a proper survey of the river. Notes the waterway appears to be affected by bacterial life and eels are the only species that appear to survive.	Not stated.
S277.005	General comments	General comments - rural	Oppose	Objects to the stock number limitation as not appropriate for a rural area. Considers the limitations on stock do not seem to take adequate account of the differences in the effect on waterways of different stock types.	Not stated.
S277.006	General comments	General comments - overall	Oppose	Concerned the effects of pest species on publicly owned land have not been taken into account sufficiently. Considers that GWRC, DOC and HCC need to undertake more pest control on public land and that private landowners should not be restricted because of the effects of pest animals on poorly managed public land.	Not stated.
S277.007	General comments	General comments - water bodies	Oppose	Seeks an urgent investigation of the extent of the wetland at the end of the Moores Valley Road. Notes they understand extensive areas of Lot 60 DP 354855 is wetland.	Not stated.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S277.008	General comments	General comments - consultation	Oppose	Notes communication from GWRC on PC1 has been poor. Objects to the short period for submissions and the closing date for submissions being so close to Christmas.	Not stated.

S219 Cuttriss Consultants Ltd

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S219.001	General comments	General comments - definitions	Not Stated	Considers that without a definition, there may be uncertainty about what constitutes a greenfield development in comparison to an infill/brownfield development. Considers a definition of 'greenfield' development will assist in providing certainty regarding the application of new rules. Considers the proposed definition of 'greenfield' development aligns with the definition of an urban environmental allotment under section 76(4C) of the RMA. Suggests this definition will not hinder the ability of large lots to accommodate the establishment of up to 2 dwellings, which is permitted by most District Plans in the region.	Amend as follows: Add definition of greenfield development: **Greenfield Development: The use of land that is predominately vacant with a site area of 4,000m² or greater, where the proposal will result in the development of 3 of more lots or dwellings for residential purposes regardless of staging.**
S219.002	General comments	General comments - overall	Oppose	Supports initiatives to improve the quality of freshwater and the state of freshwater and coastal environments. Opposes PC1 in its current form and requests it be withdrawn to allow for genuine consultation to occur, consideration of matters raised through this submission process, and consideration of the new direction from the central Government.	Withdraw PC1

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers PC1 does not provide sufficient certainty or clarity in the implementation of rules Considers PC1 will have significant financial impacts particularly on pre-committed development projects. Considers PC1 does not provide sufficient certainty or clarity in the implementation of rules.	
S219.003	General comments	General comments - urban development	Oppose	Considers PC1 potentially conflicts with the intended outcomes of the NPS-UD to provide for well-functioning urban environments, including both through infill, and greenfield developments. Notes Policy 6 requires planning decisions that affect urban environments to consider the benefits of urban development and the contributions that development makes to provide or realise development capacity, and this has not been sufficiently considered in PC1 as economic impacts have not been assessed.	Withdraw PC1
S219.004	General comments	General comments - consultation	Oppose	Considers adequate consultation was not carried out with the development community and is concerned the draft version was not sent to the development community despite Subpart 1 of the NPS-FM requiring regional councils to engage with communities and tangata whenua. Considers that given the impact and extent of the proposed changes, the publication of a draft plan and consultation with the development community would minimise potential appeals and aid towards a	Withdraw PC1

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				more workable and functioning Natural Resources Plan.	
S219.005	General comments	General comments - consultation	Not Stated	Considers GWRC should wait to see what changes to the NPS-FM are proposed by the new government coalition to ensure PC1 is in alignment. Considers PC1 was rushed as the plan does not need to be notified until 31st December 2024. Considers the imposition of new rules with immediate legal effect is inconsistent with subpart 1 of the NPS-FM as there is still a significant amount of time before the plan change has to be notified.	Withdraw PC1
S219.006	2 Interpretation	Hydrological control	Amend	Suggests the hydrological control definition should be expanded to include reference to the measures proposed to manage the flows and volumes and an acceptable solution that is easily and commonly able to be implemented. Considers the current definition does not provide certainty regarding the rate or degree to which hydrological controls need to be implemented on-site and . whilst there is mention throughout PC1 on retention, there is no definition as to an acceptable volume of water that needs to be provided for. Considers permitted activity standards (and the supporting definitions) should be clear and easy to understand without any ambiguity. References Table E10.6.3.1.1 of the Auckland Unitary Plan which contains hydrological controls. Notes a 5mm runoff depth has been used in the decision sought but recommends GWRC complete modelling to determine the runoff depth for each catchment as sensitivity to volume changes will vary between catchments. Suggests technical standards	Request the following to the definition be added : **Management measures may include:** **a) Rapid Infiltration devices such as soak pits;** **b) Permeable paving; or** **c) Rainwater retention tanks which:** **i) are plumbed into the toilet and/or an outdoor tap or taps; and** **ii) where connected to toilets, are capable of being topped up by potable water supply to a maximum volume of 100L.** **Where these measures provide a minimum retention volume of 5mm runoff depth over the impervious area which hydrology controls are required; and** **Provide detention (temporary storage) for the difference between the predevelopment and post-development runoff volumes from the 95th percentile, 24 hour rainfall event minus the 5 mm retention volume or any greater retention volume that is achieved, over the impervious area for which hydrology mitigation is required (unless further detention or infiltration measures are utilised downstream).** **Note:**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				could also be referenced.	**Compliance with the definition can be demonstrated by installing a rainwater tank in accordance with Approved Solution #1 of Wellington Water's Managing Stormwater Runoff Version 4 June 2023**
S219.007	2 Interpretation	Redevelopment	Amend	Considers the definition should exclude minor alterations and additions to existing buildings to provide for the small redevelopment of existing sites as a permitted activity in associated rules. Notes the suggested 30m² amendment aligns with recent changes to the Building Regulations for sheds to avoid consenting requirements.	Amend definition and make any other consequential amendments necessary to give effect to this submission point, to provide for small scale alterations and additions to existing buildings: For the purpose of assessment of a proposal involving the redevelopment of an existing urbanised property (i.e including brownfield development upgrades to existing roads etc.) in relation to stormwater effects. this includes the replacement, reconstruction or addition (new) of impervious surfaces. Excludes:~~minor~~ maintenance or repairs to roads, carparking areas, driveways and paving installation, maintenance or repair of underground infrastructure or network utilities requiring trenching and resurfacing activities that only involve the re-roofing of existing buildings**New buildings or alterations and additions to existing buildings of less than 30m²**
S219.008	2 Interpretation	Unplanned greenfield development	Oppose	Opposes the proposed prohibited activity rules. Considers the current provisions would make rezoning more costly, and take longer as they would require a plan change to a District Plan and the Natural Resource Plan. Considers that in some instances resource consent is more appropriate than a plan change. For example, when the size of the site or development is not such that a plan change is economically viable, or the effects are discrete and localised making a resource consent process more appropriate. Considers other proposed rules within PC1 that	Requests the deletion of this definition and all subsequent references to unplanned greenfield development. ~~Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 which also require an underlying zone change (from rural/nonurban/ open space to urban) though a District Plan change to enable the development.~~ ~~Note: Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023.~~ ~~Amend definition to align with zones under a District Plan and avoid a plan change to both District and Regional Plans:~~ Should the above relief not be obtained, submitter seeks the following revision:

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				apply greenfield development adequately address effects on water quality effects without needing to prohibit development.	Greenfield development within areas ~~identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89~~ **not zoned as urban within a District Plan.** ~~which also require an underlying zone change (from rural/nonurban/open space to urban) though a District Plan change to enable the development.~~ Note: Unplanned greenfield areas are **identified on maps 86, 87, 88 and 89** ~~those areas~~ **and include those areas** that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023. And consequential amendments to other references or policies as needed to align with the above amendment.
S219.009	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Oppose	Opposes prohibited policy and rules. Concerned prohibiting activities can lead to perverse outcomes (experienced with the NES-FW) as there is no consenting pathway to consider proposals that have a net positive impact on the environment, including freshwater and coastal systems.	Amend policy to remove reference to prohibiting unplanned greenfield development. (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.~~
S219.010	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Considers there will be instances where it is not practicable to achieve hydrological controls i.e. when retention is not possible and there are low infiltration rates, more water will be discharged to a water network, even though the peak flows are being contained. Considers source control measures should be included in this policy as they are a way of reducing copper and zinc loads.	Amend policy wording to remove (b) and replace.~~(b) where stormwater discharges will enter a river, hydrological controls either on-site, or off-site via a communal stormwater treatment system~~**(b) Source control techniques that result in copper and zinc load reductions equal to or greater than what would be achieved through on-site or communal stormwater treatment systems or devices designed in accordance with (a).**
S219.011	8 Whaitua Te	Policy WH.P16: Stormwate	Oppose	Opposes use of the term "avoid". Opposes the requirement to seek two separate plan changes if land is to be rezoned.	Request policy is deleted. ~~Policy WH.P16: Stormwater discharges from new unplanned greenfield development Avoid all new stormwater discharges from unplanned~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	r discharges from new unplanned greenfield development.			~~greenfield development where the discharge will enter a surface water body or coastal water, including through an existing local authority stormwater network.~~
S219.012	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose	Opposes the requirement for non-complying resource consent to undertake winter earthworks. Notes that as high rainfall events can occur during any time of the year, and during summer months when the ground is less permeable, it is just as likely that sediment control measures will fail. In some soil conditions (i.e. sand, river gravels) it is preferable works occur when the ground is wet because it reduces the potential for sediment to be blown into waterways. considers the s32 report fails to justify why this measure is required. Considers the current method of site-specific assessments during winter works in achieving the objectives of the NPS-FW.	Delete policy and related rules. ~~Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall:~~ ~~(a) be shut down from 1st June to 30th September each year, and~~ ~~(b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).~~
S219.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Amend	Considers connections to or from a local authority stormwater network should be managed by the local authority rather than by resource consent.	Amend Rule WH.R2 to better reflect the requirements for individual properties. Rule WH.R2: Stormwater to land - permitted activity The discharge of stormwater onto or into land, including where contaminants may enter groundwater: (a) that is not from a high risk industrial or trade premise, or (b) that **does not connect to** ~~does not discharge from, or to,~~ a local authority stormwater network, is a permitted activity provided the following conditions are met:
S219.014	8 Whaitua Te	Rule WH.R3:	Amend	Considers connections to or from a local authority stormwater network should be managed by the local	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	Stormwater from an existing individual property to surface water or coastal water - permitted activity.		authority rather than by resource consent.	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity The discharge of stormwater from an existing individual property into water, or onto or into land where it may enter a surface water body or coastal water, (a) that is not from a high risk industrial or trade premise, or (b) that is not from a port, airport or state highway, or (c) that **does not connect to** ~~does not discharge from, or to,~~ a local authority stormwater network, is a permitted activity, provided the following conditions are met:
S219.015	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	The submitter seeks an 'effectual' amnesty from the rules for all pre-committed projects. Considers the new rules will add costs to committed development projects that haven't been factored into the development costs of project viability. Concerned the immediate legal effect of new rules may adversely affect the viability of committed development projects, as the decision to purchase and proceed with development was undertaken without consideration of PC1. Disagrees with the new rules having immediate legal effect in accordance with Part 2 of the RMA as it does not provide for all three principles of sustainable management which must include economic well-being. Considers the new rules will have significant costs associated with: - Re-design to retrofit stormwater quality treatment including consultant costs; - Construction of stormwater quality treatment devices - Resource consenting costs including the	Amend Rule WH.R5 and make any consequential amendments to other references or policies as needed to enable pre-committed development projects to proceed without disrupting financial planning. Rule WH.R5.... - permitted activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or new local authority stormwater network, that is not a high risk industrial or trade premise or unplanned greenfield development, is a permitted activity, provided the following conditions are met: (a) **A local authority has accepted a resource consent application for the activity prior to 30 October 2024, or where resource consent was either not required under the Natural Resources Plan, or Greater Wellington Regional Council has accepted a resource consent application for the activity prior to 30 October 2024, and that resource consent is given effect to within 2 years of being granted; or** (b) The proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m² (baseline existing impervious area as at 30 October

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				lodgement and processing of a consent or section 127 change of condition application and consultant costs. - Holding costs associated with delays in carrying out development. - Compliance and Monitoring costs associated with resource consent conditions; - Legal costs, particularly where lots or development has been sold off the plan, and design changes are necessary to accommodate stormwater quality treatment and hydrological controls; - Development contributions applicable to greenfield development. Considers the above costs are substantial, and may render projects infeasible. Outlines that the immediate imposition of new rules and associated costs, have not been priced in and will provide uncertainty on the viability of many projects. Considers projects that already have resource consent from a local authority will be the greatest impacted. Requests that whilst under section 86A of the RMA, the rules have immediate legal effect, the rule be written to have a later effectual legal effect. Considers the suggested amendments to Rule WH-R5 would allow sufficient time for pre-committed projects without resource consent to proceed with confidence, and allow pre-consented projects to proceed without design changes or additional consenting costs until their lapse period (typically 5 years). Considers if the new rules are applied to new	2023~~3~~4); and (c) all new building materials associated with the development shall not include exposed zinc (including galvanised steel) or copper roof, cladding and spouting materials, and (d) the proposal provides hydrological control measures (for example **rapid infiltration devices, permeable paving, or water re-use** ~~rain~~ tanks) onsite or offsite, where discharges will enter a surface water body (including via an existing local authority stormwater network): (e) for all impervious areas associated with a greenfield development, or (f) for all redeveloped and new impervious areas involving greater than 30m2 of impervious area of a redevelopment (of an existing urbanised property), and (g) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (h) the discharge does not contain wastewater, and (i) the concentration of total suspended solids in the discharge shall not exceed: (j) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (k) 100g/m3 where the discharge enters any other water, and where the discharge is not via an existing or new local authority stormwater network: (l) the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (m) the discharge shall not give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than (n) 20% in a River class 1 and in any river identified as

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				projects from November 2024 onwards, they can be accounted for in the investment decision, thereby achieving the purpose of the NPS-FM without putting projects at risk of not proceeding. Requests the addition of a sunset clause stating 'given effect to within 2 years' aligning with the lapse period under the COVID-19 Recovery (Fast-track Consenting) Act 2020 so the effectual amnesty would apply to projects that are intended to develop within a reasonable timeframe, rather than applying to projects that want to hold or land bank development. Considers the added sunset clause will provide confidence in the delivery of pre-committed projects which will aid in providing additional housing under the NPS-UD. Seeks to include other means of hydrological control in the rule, refer to hydrological control definition above. Requests that whilst under section 86A of the RMA, the rules have immediate legal effect, the rule be written to have a later effectual legal effect. Considers the suggested amendments to Rule WH-R5 would allow sufficient time for pre-committed projects without resource consent to proceed with confidence, and allow pre-consented projects to proceed without design changes or additional consenting costs until their lapse period (typically 5 years). Considers that if new rules apply new projects from November 2024 onwards, they can be accounted for in the investment decision, thereby achieving the purpose of the NPS-FM without putting projects at risk of not proceeding.	having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (o) 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Requests the addition of a sunset clause of 'given effect to' within 2 years, aligning with the lapse period under the COVID-19 Recovery (Fast-track Consenting) Act 2020 so the effectual amnesty would apply to projects that are intended to develop within a reasonable timeframe, rather than applying to projects that want to hold or land bank development. Considers the added sunset clause will provide confidence in the delivery of pre-committed projects which will aid in providing additional housing under the NPS-UD. Seeks to include other means of hydrological control in the rule, refer to hydrological control definition above.	
S219.016	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Considers the timing should align with the feedback provided for Rule WH.R5 Add to a controlled activity recognition of circumstance where hydrological control cannot be achieved.	Amend wording to reference 2024, not 2023 (a) the proposal involves the creation of new impervious surfaces of between 1,000m2 and 3,000m2 (baseline property existing impervious area as at 30 October 202~~3~~**4**)
S219.017	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	merged above	Amend Rule WH.R6 to as follows: ... (d) where stormwater directly or indirectly (through an existing local authority stormwater network) discharges to a river, hydrological control is provided either: i) on-site, or ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has been sized to accommodate the proposed stormwater discharges; or**iii) Where a suitably qualified person has confirmed that soil infiltration rates are less than**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					2mm/hr or there is no area on the site of sufficient size to accommodate all required infiltration that is free of geotechnical limitations (including slope, setback from infrastructure, building structures or boundaries and water table depth), and rainwater reuse is not available because: **i. the quality of the stormwater runoff is not suitable for on-site reuse (i.e. for non-potable water supply, garden/crop irrigation or toilet flushing); or** **ii. there are no activities occurring on the site that can re-use the full 5mm retention volume of water.** **The retention volume can be taken up by providing detention (temporary storage) for the difference between the pre-development and post development runoff volumes from the 95th percentile, 24 hour rainfall event minus any retention volume that is achieved, over the impervious area for which hydrology mitigation is required.**
S219.018	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Amend	Considers the timing should align with the feedback provided for Rule WH.R5	Amend wording to reference 2024, not 2023 (a) the proposal involves the creation of new impervious surfaces of between 1,000m2 and 3,000m2 (baseline property existing impervious area as at 30 October 202~~3~~**4**)
S219.019	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield	Oppose	Opposes the prohibited policy and rules. Concerned prohibiting activities can lead to perverse outcomes as there is no consenting pathway to consider a proposal that could have a net positive impact on the environment including	Delete and reword rule as follows.~~Rule WH.R13: Stormwater from new unplanned greenfield development – prohibited activity~~ ~~The use of land and the associated discharge of stormwater from impervious surfaces from unplanned greenfield development direct into water, or onto or into land where it~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		development - prohibited activity.		freshwater and coastal systems. Refers to their rationale on Unplanned Greenfield Development.	~~may enter a surface water body or coastal water, including through an existing or proposed stormwater network, is a prohibited activity.~~ Should the above relief not be obtained, we seek: Rule WH.R13: Stormwater from new unplanned greenfield development ~~- prohibited activity~~ **discretionary activity**
S219.020	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	Opposes the requirement for non-complying resource consent to undertake winter earthworks. Notes that as high rainfall events can occur during any time of the year, and during summer months when the ground is less permeable, it is just as likely that sediment control measures will fail. In some soil conditions (i.e. sand, river gravels) it is preferable works occur when the ground is wet because it reduces the potential for sediment to be blown into waterways. considers the s32 report fails to justify why this measure is required. Considers the current method of site-specific assessments during winter works in achieving the objectives of the NPS-FW.	Amend rule to as follows. Rule WH.R24: Earthworks - restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, ~~and~~ ~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~
S219.021	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal	Oppose	Opposes prohibited policy and rules. Concerned prohibiting activities can lead to perverse outcomes (experienced with the NES-FW) as there is no consenting pathway to consider proposals that have a net positive impact on the environment, including freshwater and coastal systems.	Request policy is amended to remove reference to prohibiting unplanned greenfield development. wording proposed is as follows: (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,~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		water objectives.			
S219.022	9 Te Awarua-o-Porirua Whaitua	Policy P.P12: Managing stormwater network discharges through a Stormwater Management Strategy.	Oppose	Submitter refers to feedback provided on Rule WH.P12 (note no feedback was provided on rule WH.P12 within the submission	Submitter refers to proposed amendment to Policy WH.P12 (note no amendment was provided on policy WH.P12 within the submission)
S219.023	9 Te Awarua-o-Porirua Whaitua	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Considers there will be instances where it is not practicable to achieve hydrological controls i.e. when retention is not possible and there are low infiltration rates, more water will be discharged to a water network, even though the peak flows are being contained. Considers source control measures should be included in this policy as they are a way of reducing copper and zinc loads.	Submitter refers to proposed amendment on policy WH.P13 (note no amendment to policy WH.P13 was provided within the submission
S219.024	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Oppose	Opposes use of the term "avoid". Opposes the requirement to seek two separate plan changes if land is to be rezoned.	Submitter refers to proposed amendment on policy WH.P15 (note no amendment to policy WH.P15 was provided within the submission)
S219.025	9 Te Awarua-	Policy P.P29: Winter	Oppose	Opposes the requirement for non-complying resource consent to undertake winter earthworks.	Delete policy and related rules. ~~Policy WH.P31: Winter shut down of earthworks~~ ~~Earthworks over 3,000m2 in area shall: (a) be shut down~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	shut down of earthworks.		Notes that as high rainfall events can occur during any time of the year, and during summer months when the ground is less permeable, it is just as likely that sediment control measures will fail. In some soil conditions (i.e. sand, river gravels) it is preferable works occur when the ground is wet because it reduces the potential for sediment to be blown into waterways. considers the s32 report fails to justify why this measure is required. Considers the current method of site-specific assessments during winter works in achieving the objectives of the NPS-FW.	~~from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).~~
S219.026	9 Te Awarua-o-Porirua Whaitua	Rule P.R2: Stormwater to land - permitted activity.	Amend	Considers connections to or from a local authority stormwater network should be managed by the local authority rather than by resource consent.	Submitter refers to proposed amendment to policy WH.R2.
S219.027	9 Te Awarua-o-Porirua Whaitua	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Amend	Considers connections to or from a local authority stormwater network should be managed by the local authority rather than by resource consent.	Submitter refers to proposed amendment to Policy WH.R3
S219.028	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped	Amend	The submitter seeks an 'effectual' amnesty from the rules for all pre-committed projects. Considers the new rules will add costs to committed development projects that haven't been factored into the development costs of project viability.	Submitter refers to proposed amendment to Policy WH.R3

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		impervious surfaces - permitted activity.		Concerned the immediate legal effect of new rules may adversely affect the viability of committed development projects, as the decision to purchase and proceed with development was undertaken without consideration of PC1. Disagrees with the new rules having immediate legal effect in accordance with Part 2 of the RMA as it does not provide for all three principles of sustainable management which must include economic well-being. Considers the new rules will have significant costs associated with: - Re-design to retrofit stormwater quality treatment including consultant costs; - Construction of stormwater quality treatment devices - Resource consenting costs including the lodgement and processing of a consent or section 127 change of condition application and consultant costs. - Holding costs associated with delays in carrying out development. - Compliance and Monitoring costs associated with resource consent conditions; - Legal costs, particularly where lots or development has been sold off the plan, and design changes are necessary to accommodate stormwater quality treatment and hydrological controls; - Development contributions applicable to greenfield development. considers the above costs are substantial, and may render projects infeasible. Outlines that the immediate imposition of new rules	

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				and associated costs, have not been priced in and will provide uncertainty on the viability of many projects. Considers projects that already have resource consent from a local authority will be the greatest impacted. Requests that whilst under section 86A of the RMA, the rules have immediate legal effect, the rule be written to have a later effectual legal effect. Considers the suggested amendments to Rule WH-R5 would allow sufficient time for pre-committed projects without resource consent to proceed with confidence, and allow pre-consented projects to proceed without design changes or additional consenting costs until their lapse period (typically 5 years). Considers if the new rules are applied to new projects from November 2024 onwards, they can be accounted for in the investment decision, thereby achieving the purpose of the NPS-FM without putting projects at risk of not proceeding. Requests the addition of a sunset clause stating 'given effect to within 2 years' aligning with the lapse period under the COVID-19 Recovery (Fast-track Consenting) Act 2020 so the effectual amnesty would apply to projects that are intended to develop within a reasonable timeframe, rather than applying to projects that want to hold or land bank development. Considers the added sunset clause will provide confidence in the delivery of pre-committed projects which will aid in providing additional housing under the NPS-UD. Seeks to include other means of hydrological	

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				control in the rule, refer to hydrological control definition above. Requests that whilst under section 86A of the RMA, the rules have immediate legal effect, the rule be written to have a later effectual legal effect. Considers the suggested amendments to Rule WH-R5 would allow sufficient time for pre-committed projects without resource consent to proceed with confidence, and allow pre-consented projects to proceed without design changes or additional consenting costs until their lapse period (typically 5 years). Considers that if new rules apply new projects from November 2024 onwards, they can be accounted for in the investment decision, thereby achieving the purpose of the NPS-FM without putting projects at risk of not proceeding. Requests the addition of a sunset clause of 'given effect to' within 2 years, aligning with the lapse period under the COVID-19 Recovery (Fast-track Consenting) Act 2020 so the effectual amnesty would apply to projects that are intended to develop within a reasonable timeframe, rather than applying to projects that want to hold or land bank development. Considers the added sunset clause will provide confidence in the delivery of pre-committed projects which will aid in providing additional housing under the NPS-UD. Seeks to include other means of hydrological control in the rule, refer to hydrological control definition above.	

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S219.029	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Considers the timing should align with the feedback provided for Rule WH.R6	Amend wording to reference 2024, not 2023 (a)the proposal involves the creation of new impervious surfaces of between 1,000m2 and 3,000m2 (baseline property existing impervious area as at 30 October 203~~4~~**4**) Amend Rule WH.R6 to as follows ... (d) where stormwater directly or indirectly (through an existing local authority stormwater network) discharges to a river, hydrological control is provided either: i) on-site, or ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has been sized to accommodate the proposed stormwater discharges; or**iii) Where a suitably qualified person has confirmed that soil infiltration rates are less than 2mm/hr or there is no area on the site of sufficient size to accommodate all required infiltration that is free of geotechnical limitations (including slope, setback from infrastructure, building structures or boundaries and water table depth), and rainwater reuse is not available because:** **i. the quality of the stormwater runoff is not suitable for on-site reuse (i.e. for non-potable water supply, garden/crop irrigation or toilet flushing); or** **ii. there are no activities occurring on the site that can re-use the full 5mm retention volume of water.** **The retention volume can be taken up by providing detention (temporary storage) for the difference between the pre-development and post development runoff volumes from the 95th percentile, 24 hour rainfall event minus any retention volume that is achieved, over the impervious area for which hydrology mitigation is required.**
S219.030	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and	Amend	Considers the timing should align with the feedback provided for Rule WH.R5	Submitter refers to their proposed amendment to Policy WH.R7

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		redeveloped impervious surfaces of existing urbanised areas-controlled activity.			
S219.031	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Amend	Submitter refers to feedback provided on Rule WH.P23 (note no feedback was provided on rule WH.P23 within the submission.	Submitter refers to proposed amendment to Policy WH.R23 (that no amendment was provided for policy WH.P23 within the submission)
S219.032	12 Schedules	Schedule 30: Financial Contributions.	Amend	Considers payment of financial contributions for greenfield development should be based on the point source of contaminants, being the impervious area, rather than on a per lot (or EHU) basis. Suggests this should be on a m² basis as it applies to non-greenfield development.	Amend the Part D calculation of level of contribution of Schedule 30 to: D Calculation of level of contribution Financial contributions shall be calculated ~~per EHU for residential greenfield development (Table D1), or~~ per 100m2 for ~~non-residential greenfield~~ development and new roads/state highways. And consequential amendments to other references or policies as needed to align with the above amendment.
S219.033	12 Schedules	A Context	Not Stated	Considers the payment of financial contributions should be levied by a local authority at the same time as the payment of other development contributions, for ease of administration, enforcement, and better alignment with when the effect is likely to be present. Suggests the payment of financial contribution be undertaken in a similar manner to rates payments where rates are paid and administered by a local authority, but allocated between regional and local	Amend the Part D calculation of level of contribution of Schedule 30 to: Financial contributions shall be imposed as a condition of consent and will be collected **by the local authority at the same time as payment of any other financial or development contributions are paid** ~~prior to the consent being given effect to.~~ And consequential amendments to other references or policies as needed to align with the above amendment.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				councils. Concerned the current timing of the payment (when consent is given effect to) will add to upfront development costs, particularly for large staged development, putting many projects at risk as many developers rely on pre-sales to obtain funding for works. Considers provisions should be made for circumstances where residual contaminants are being treated on-site i.e. where using a treatment device further reduces contaminants beyond the assumed residual contaminants or where it treats contaminants off-site, such that the net contamination load is reduced following the development i.e. if the development treats flow from upstream.	**Note a reduced contribution will be applied if the post-development residual contaminant load is less than 15%, or where treatment contributes towards a reduction in off-site contaminants.**
S219.034	12 Schedules	D Calculation of level of contribution	Amend	Notes that Schedule 28 states the target load reduction factor for bioretention is 90%, however the financial contribution is calculated based on treating 15% of remaining contaminant loading. Concerned there has not been an Economic Impact Assessment completed to inform these numbers and if PC1 is requiring treatment to 90%, then any financial contribution should be reduced proportionately i.e. 1/3.	Amend the Part D financial contribution as follows: Whaitua Te Whanganui-a-Tara ~~$4,240~~ **2,827** Te Awarua-o-Porirua Whaitua ~~$4,599~~ **3,066** (Noting the submission point above, whereby we seek to remove charges based on EHU and therefore this table should be deleted in entirety) Whaitua Te Whanganui-a-Tara ~~$858~~ **572** ~~$360~~ **240** Te Awarua-o-Porirua Whaitua ~~$858~~ **572** ~~$360~~ **240** Furthermore, these numbers should be assessed following a peer reviewed Economic Impact Assessment.

S058 David and Carolyn Gratton

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S58.001	General comments	General comments - overall	Not Stated	Supports the submissions made by the New Zealand Farm Forestry Association and the Wellington Branch of the New Zealand Farm Forestry Association.	Not stated
S58.002	General comments	General comments - economic cost/impact	Not Stated	Believes PC1 will make it difficult to support family economic well-being or make reasonable use of the land citing section 85 of the RMA.	Clarify requirements imposed on land adjacent to high/highest risk land (pasture) or remove provisions from PC1.
S58.003	General comments	General comments - economic cost/impact	Amend	Concerned about timing and costs of preparing erosion plans. Wants to see MPI erosion susceptibility tool used. Considers the mapping used in PC1 is not suitable for determining erosion prone land.	Retain the NES-CF and exempt forestry blocks of less than 100ha from the PC1 controlled activity requirements.
S58.004	General comments	General comments – plantation forestry	Amend	Believes the NES-CF has tighter controls than the NES-PF and should be given time to bed in before controls which go beyond the NES-CF are imposed. The additional requirement to provide an erosion and sediment control plan early in the soil disturbance process is unrealistic and unreasonable.	Retain the NES-CF and exempt forestry blocks of less than 100ha from the PC1 controlled activity requirements.
S58.005	General comments	General comments - economic cost/impact	Oppose	Believes small farms of less than 10ha should be exempt from PC1 provisions and the need to provide erosion management plans. If required, management plans should be simple to avoid consultants needing to be hired. Suggests lack of clarity on requirements for land that is not high/highest erosion risk.	Exempt small farms of less than 10ha from regulations requiring farm management/erosion risk management requirements to be prepared by farm consultants. Clarify requirements imposed on land adjacent to high/highest risk land (pasture) or remove provisions from PC1.
S58.006	6 Other methods	Method M42: Small farm property	Oppose	Concerns with the additional cost of small farm registration	Remove requirement for small farm registration

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		registration within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.			

S234 David and Pauline Innes

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S234.001	General comments	General comments - overall	Oppose	Considers the plan change is inaccessible, difficult to read, and the maps are unclear. Considers the document is difficult to read and is not fit for purpose. Concerned the connections between the policies and the geographic areas are inadequate.	Not stated
S234.002	General comments	General comments - maps	Oppose	Concerned the map system used in Change 1 is not fit for purpose, and streams that have been individually listed in the schedule were merged together in the GIS data. Considers identifying streams by coordinates is an inappropriate level of identification, and each stream should have been shown on a map and identified with reference to features that the reader could identify. Considers the document is difficult to read and is not fit for purpose. Concerned the connections between the policies and the geographic areas are inadequate.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S234.004	General comments	General comments - water bodies	Oppose	The submitter seeks clarity about whether the stream at the rear of their property is listed in the schedule and what wildlife has been identified for this stream. Notes the stream is subject to multiple water control features associated with urban development. Requests that GWRC note that there is no natural passage for fish on the stream.	Not stated
S234.005	General comments	General comments - water bodies	Oppose	Objects to the description of Wainuiomata-iti Stream (Wainuiomata Stream). Considers the waterway needs to be described by a proper survey of the river. Notes the waterway appears to be affected by bacterial life and eels are the only species that appear to survive.	Not stated
S234.006	General comments	General comments - rural	Oppose	Objects to the stock number limitation as not appropriate for a rural area. Considers the limitations on stock do not seem to take adequate account of the differences in the effect on waterways of different stock types.	Not stated
S234.007	General comments	General comments - overall	Oppose	Concerned the effects of pest species on publicly owned land have not been taken into account sufficiently. Considers that GWRC, DOC and HCC need to undertake more pest control on public land and that private landowners should not be restricted because of the effects of pest animals on poorly managed public land.	Not stated
S234.008	General comments	General comments - water bodies	Oppose	Seeks an urgent investigation of the extent of the wetland at the end of the Moores Valley Road. Notes they understand extensive areas of Lot 60 DP 354855 is wetland.	Not stated
S234.009	General comments	General comments - overall	Oppose	Objects to the set levels of copper and zinc contamination.	Not stated
S234.010	General comments	General comments - consultation	Oppose	Notes communication from GWRC on PC1 has been poor. Objects to the short period for submissions and the closing date for submissions being so close to Christmas.	Not stated

S184 David Bennett & Jenni Lean

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S184.001	General comments	General comments - overall	Not Stated	Supports the submissions of the New Zealand Farm Forestry Association Inc, and the Wellington Branch of the New Zealand Farm Forestry Association.	Not stated
S184.002	General comments	General comments - economic cost/impact	Oppose	Concerns that forestry rules under PC1 would render submitters forestry land uneconomic and incapable of reasonable use under section 85 of the RMA.	Not stated

S190 David McKevitt

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S190.001	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Amend	Considers the proposed TSS limit of 100g/m3 is not based on scientific evidence, and is a significant reduction from the existing threshold of 170 NTU. Concerned technical publications for PC1 do not refer to the TSS standard of 100g/m3 and questions how this standard was decided and whether it is scientifically linked to the target attribute states. States GWRC and the earthworks industry have largely moved from TSS for compliance measurements to NTU. Considers NTU is a more effective and quicker measurement for compliance than TSS. Questions why it is deemed acceptable that the upstream and **downstream** comparison when TSS exceeds 100g/m3 can be made using visual clarity (aka turbidity in NTU), when the preceding measurements in the policy are prescribed in TSS.	Re-evaluate and re-draft proposed TSS limit. Provide for proxy field measurements as a substitute for TSS, such as NTU.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S190.002	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Amend	Supports the management of increased risk during high rainfall, however considers that the length of the proposed winter period is too onerous for the number of activities that require earthworks, particularly given that the definition of earthworks includes a broader range of activities. Notes earthworks are currently successfully completed during the winter works period with appropriate management of risk from increased rainfall, with the relevant risk factors taken into account by GWRC for each site. Considers blanket activity status for all winter earthworks removes the ability for GWRC to consider factors such as the compliance history of a consent holder, and consent holders with inadequate performance could be more likely to be authorised to undertake winter works than under the current regime. Notes under the operative definition of earthworks, lower risk activities could be completed during the winter works period, such as trenching for infrastructure and services. Concerned such activities will require resource consent, therefore being onerous on contractors and lengthening project durations, without achieving an appropriate reduction in environmental risk.	Earthworks over 3,000m2 in area shall: (a) be ~~shut down~~ limited from 1st June to 30th September each year, with a risk-based approach taken to the permitting of earthworks activities during this period, and (b) prior to ~~shut down~~ 1st June, areas to be shut down shall be stabilised against erosion and have sediment controls in place using good management practices in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).
S190.003	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	States the discharge of sediment from earthworks is unavoidable even with the use of sediment controls. Cites the technical reports for PC1, which reference studies specifying that the sediment removal of all devices are less than 100%, and that sediment discharge occurs even when the earthworks catchment is stabilised. Concerned the rule is unachievable and all earthworks, regardless of size and treatment, will require resource consent. States lower rates of sediment discharge continue to occur	(iv) There is no discharge of runoff sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, that is not treated by erosion and sediment control measures, and (v) Erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				even from areas stabilised permanently with grass cover.	path connects with a surface water body or the coastal marine area, including via a stormwater network.
S190.004	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	Considers the proposed TSS limit of 100g/m3 is not based on scientific evidence, and is a significant reduction from the existing threshold of 170 NTU. Concerned technical publications for PC1 do not refer to the TSS standard of 100g/m3 and questions how this standard was decided and whether it is scientifically linked to the target attribute states. States that GWRC and the earthworks industry have largely moved from TSS for compliance measurements to NTU. Considers that NTU is a more effective and quicker measurement for compliance than TSS. Questions why it is deemed acceptable that the upstream and **downstream** comparison when TSS exceeds 100g/m3 can be made using visual clarity (aka turbidity in NTU), when the preceding measurements in the policy are prescribed in TSS. Supports the management of increased risk during high rainfall, however considers that the length of the proposed winter period is too onerous for the number of activities that require earthworks, particularly given that the definition of earthworks includes a broader range of activities. Notes earthworks are currently successfully completed during the winter works period with appropriate management of risk from increased rainfall, with the relevant risk factors taken into account by GWRC for each site. Considers a blanket activity status for all winter earthworks removes the ability for GWRC to consider factors such as the compliance history of a consent holder, and consent holders with inadequate performance could be more likely to be authorised to undertake winter works than under the	~~(a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than:~~ ~~(i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or~~ ~~(ii) 30% in any other river, and~~ The proposed total suspended solids limit is re-evaluated and re-drafted. Provision is made for proxy field measurements, such as NTU (nephelometric turbidity units), can be utilised to substitute for total suspended solids ~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~ The submitter requests that earthworks activities during the winter period is inserted as a matter of discretion under this rule: (a) Earthworks over 3000m2 shall be limited from 1st June to 30th September each year, with a risk-based approach taken to the permitting of earthworks activities during this period, and (b) prior to 1st June, areas to be shut down shall be stabilised against erosion and have sediment controls in place using good management practices in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				current regime. Notes under the operative definition of earthworks, lower risk activities could be completed during the winter works period, such as trenching for infrastructure and services. Concerned such activities will require resource consent, therefore being onerous on contractors and lengthening project durations, without achieving an appropriate reduction in environmental risk.	
S190.005	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Amend	Considers the proposed TSS limit of 100g/m3 is not based on scientific evidence, and is a significant reduction from the existing threshold of 170 NTU. Concerned technical publications for PC1 do not refer to the TSS standard of 100g/m3 and questions how this standard was decided and whether it is scientifically linked to the target attribute states. States that GWRC and the earthworks industry have largely moved from TSS for compliance measurements to NTU. Considers that NTU is a more effective and quicker measurement for compliance than TSS. Questions why it is deemed acceptable that the upstream and down stream comparison when TSS exceeds 100g/m3 can be made using visual clarity (aka turbidity in NTU), when the preceding measurements in the policy are prescribed in TSS.	Re-evaluate and re-draft proposed TSS limit. Provide for proxy field measurements as a substitute for TSS, such as NTU.
S190.006	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Amend	Supports the management of increased risk during high rainfall, however considers that the length of the proposed winter period is too onerous for the number of activities that require earthworks, particularly given that the definition of earthworks includes a broader range of activities. Notes that currently, earthworks are successfully completed during the winter works period with appropriate management of risk from increased rainfall, with the relevant risk factors taken into account by GWRC for each site. Considers a blanket activity status for	Earthworks over 3,000m2 in area shall: (a) be ~~shut down~~ limited from 1st June to 30th September each year, with a risk-based approach taken to the permitting of earthworks activities during this period, and (b) prior to ~~shut down~~ 1st June, areas to be shut down shall be stabilised against erosion and have sediment controls in place using good management practices in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				all winter earthworks removes the ability for GWRC to consider factors such as the compliance history of a consent holder, and that consent holders with inadequate performance could be more likely to be authorised to undertake winter works than under the current winter works application regime. Noted under the operative definition of earthworks, that lower risk activities could be completed during the winter works period, such as trenching for infrastructure and services. Expressed concern that such activities will require resource consent, therefore being onerous on contractors and lengthen project durations, without achieving an appropriate reduction in environmental risk.	
S190.007	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Amend	States the discharge of sediment from earthworks is unavoidable even with the use of sediment controls. Cites the technical reports for PC1, which reference studies specifying that the sediment removal of all devices are less than 100%, and that sediment discharge occurs even the earthworks catchment is stabilised. Therefore, the submitter's interpretation of the rule is that all earthworks, regardless of size and treatment, will not comply and will therefore require resource consent. States that lower rates of sediment discharge continue to occur even from areas stabilised permanently with grass cover. States all of the sediment controls under Section F1.0 of GWRC's Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021) have a sediment removal efficiency of less than 100%, citing the technical reports referenced in PC1.	(iv) There is no discharge of runoff sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, that is not treated by erosion and sediment control measures, and (v) Erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.
S190.008	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted	Amend	Considers the proposed TSS limit of 100g/m3 is not based on scientific evidence, and is a significant reduction from the existing threshold of 170 NTU. Concerned technical publications for PC1 do not refer to the TSS standard of 100g/m3 and questions how this standard was decided and whether it is	(a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discretionary activity.		scientifically linked to the target attribute states. States that GWRC and the earthworks industry have largely moved from TSS for compliance measurements to NTU. Considers that NTU is a more effective and quicker measurement for compliance than TSS. Questions why it is deemed acceptable that the upstream and down stream comparison when TSS exceeds 100g/m3 can be made using visual clarity (aka turbidity in NTU), when the preceding measurements in the policy are prescribed in TSS. Supports the management of increased risk during high rainfall, however considers that the length of the proposed winter period is too onerous for the number of activities that require earthworks, particularly given that the definition of earthworks includes a broader range of activities. Notes earthworks are currently successfully completed during the winter works period with appropriate management of risk from increased rainfall, with the relevant risk factors taken into account by GWRC for each site. Considers a blanket activity status for all winter earthworks removes the ability for GWRC to consider factors such as the compliance history of a consent holder, and consent holders with inadequate performance could be more likely to be authorised to undertake winter works than under the current regime. Notes under the operative definition of earthworks, lower risk activities could be completed during the winter works period, such as trenching for infrastructure and services. Concerned such activities will require resource consent, therefore being onerous on contractors and lengthening project durations, without achieving an appropriate reduction in environmental risk.	not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: ~~(i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or~~ ~~(ii) 30% in any other river, and~~ ~~The proposed total suspended solids limit is re-evaluated and re-drafted.~~ Provision is made for proxy field measurements, such as NTU (nephelometric turbidity units), can be utilised to substitute for total suspended solids ~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~ The submitter requests that earthworks activities during the winter period is inserted as a matter of discretion under this rule: (a) Earthworks over 3000m2 shall be limited from 1st June to 30th September each year, with a risk-based approach taken to the permitting of earthworks activities during this period, and (b) prior to 1st June, areas to be shut down shall be stabilised against erosion and have sediment controls in place using good management practices in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021)

S030 Dean Spicer

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S30.001	General comments	General comments - consultation	Not Stated	Considers GWRC failed to adequately consult affected landowners. Considers GWRC failed to consider proposed UHCC plan Change 50 rural 'PC50'.	Withdraw PC1 and conduct appropriate consultation and engagement.
S30.002	General comments	General comments - overall	Not Stated	Considers PC1 is inconsistent with UHCC PC50, highlighting lack of due process of PC1.	Withdraw PC1 and conduct appropriate consultation and engagement.
S30.003	General comments	General comments - economic cost/impact	Not Stated	Concerned environmental and cultural benefits have not been quantified through an economic impact assessment and the process has been rushed and poorly developed. Considers council may have breached duties under Te Tiriti o Waitangi. Challenges the credibility of the plan change.	GWRC withdraw current PC1 and undertake economic, social and cultural impact assessment that is publicly disclosed, and use it to inform revised plan change.
S30.004	General comments	General comments - overall	Not Stated	Considers PC1 contains drafting errors and fails to define key terms. Considers stakeholders have been prevented from understanding what is proposed which has impacted their ability to make well informed submissions.	PC1 redrafted correctly and resubmitted for consultation.
S30.005	2 Interpretation	Unplanned greenfield development	Amend	Considers new unplanned greenfield developments should not be prohibited as prohibition fails to consider the merits of development individually. Highlights emergence of new infrastructure which will reduce environmental impact from new developments. Considers GWRC should consider greenfield developments individually based on impacts and proposed mitigants. Strongly objects to prohibited activity status and seeks this be reviewed and amended to appropriately reflect the outcome of UHCC Plan Change 50.	Remove prohibited activity status and allow applications for new unplanned greenfield developments.

S005 Diane Strugnell

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S5.001	3 Objectives	Objective O19: Biodiversity, aquatic ecosystem health and mahinga kai in freshwater bodies and the coastal marine area are safeguarded.	Amend	Concerned that without clear support, both advisory and financial, encouragement is required. Cites that Te Awarua-o-Porirua Whaitua committee suggested there were greater benefits to "carrots rather than sticks".	Amend: (c) restoration of aquatic ecosystem health and mahinga kai is encouraged **with appropriate support from central and regional government.**
S5.002	6 Other methods	Method M36: Freshwater Action Plan programme.	Not Stated	Considers it is important that requirement is retained for GWRC to develop Freshwater Action Plans that are informed by engagement with rural landowners as significant stakeholders. Concerned the plan has been developed through modelling rather than based on actual data. Considers data collection should be at a smaller subcatchment scale or, in the case of larger farms, at an individual farm scale.	Retain as notified.
S5.003	6 Other methods	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara	Not Stated	Concerned there are inaccuracies regarding fish passage information within Te Awarua-o-Porirua whaitua, based on the NIWA's Fish passage Assessment Tool. Considers the inaccuracies need to be identified and recorded accurately to achieve successful programmes for fish passage remediation.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and Te Awarua-o-Porirua Whaitua.			
S5.004	6 Other methods	Method M41: Identifying and responding to degradation in freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Not Stated	Considers work should be undertaken at subcatchment level to address degradation of freshwater bodies to obtain accurate data and implement actions targeting specific causes of degradation.	Amend: Wellington Regional Council will identify degradation of freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua **at a sub-catchment scale based on accurate data using recognised assessment tools.** This programme will, at least once every five years, publish information identifying degrading trends for waterbodies. Any such analysis may be part of a plan effectiveness or action plan review or part of any other process.
S5.005	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Not Stated	Considers any programmes implemented need to support rural landowners in various ways as identified. Concerned that the direct benefits associated with actions specified within the plan change are predominantly benefit for others where the cost are largely borne by the landowner. Considers the provision of appropriate support helps to redress this imbalance.	Retain as notified.
S5.006	9 Te Awarua-o-Porirua Whaitua	Objective P.O2: Te Awarua-o-Porirua's groundwater, rivers,	Amend	Agrees large sediment loads have entered the harbour, associated with human activity and natural events. Considers "a more natural level" needs either a different definition or way to quantify the meaning.	Amend to better define what is meant by "a more natural level".

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		lakes and natural wetlands, and their margins are on a trajectory of measurable improvement towards wai ora.			
S5.007	9 Te Awarua-o-Porirua Whaitua	Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Oppose	Considers it is unclear how these attributes will be measured at a individual property level and how woody vegetation on high erosion risk land will change these. Notes across FMUs, many attribute states are within natural occurring limits.	Delete or amend the policy to reflect the attribute states and the actions that will retain or improve these states.
S5.008	9 Te Awarua-o-Porirua Whaitua	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Amend	Considers the NRP provides a definition of good management practice. Considers the "phased out" statement is unnecessary because adoption of good practices will replace "poor management practices".	Amend: (ii) the nitrogen discharge risk is minimised by the adoption of good management practices, ~~and by the phasing out of any poor management practices, and~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S5.009	9 Te Awarua-o-Porirua Whaitua	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	Concerned erosion risk is thought to be associated with landslides rather than more subtle sediment loss.	Amend: Achieving reductions in sediment discharges from farming activities on land with high **sediment loss** risk of ~~erosion~~
S5.010	9 Te Awarua-o-Porirua Whaitua	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	Considers the mapping needs to be accurate at farm scale to identify areas of high risk for sediment loss. Suggests the methods chosen to address sediment loss need to be suited to individual farms. Considers alternative methods need to be available and supported. Considers the effectiveness in reducing sediment loss should be linked to reaching attribute states instead of specific time frames. Considers rectifying the degradation of should involve measurable outcomes in freshwater health rather than a timeline to one treatment method that may not deliver.	Amend: Reduce discharges of sediment from farming activities on high and highest erosion risk land by: (a) identifying highest erosion risk land (pasture) and high erosion risk land (pasture) used for pastoral farming, and (b) requiring that farm environment plans prepared for farms with highest erosion risk land (pasture) and/or highest erosion risk land (pasture) include an erosion risk treatment plan, and (c) ensuring erosion risk treatment plans: (i) deliver ~~permanent woody vegetation cover on at least 50% of any highest erosion risk land (pasture) that is in pasture on a farm within 10 years, and~~ appropriate treatment for the highest erosion risk land (pasture) that is in pasture on the farm, and (ii) identify and respond to risks of sediment loss on high erosion risk land (pasture) associated with grazing livestock, earthworks or vegetation clearance, by using effective erosion control treatment ~~by 30 June 2040,~~ and (d) Wellington Regional Council providing support to landowners to implement erosion risk treatment plans.
S5.011	9 Te Awarua-o-Porirua Whaitua	Policy P.P24: Managing rural land	Amend	Questions whether subdivision into small blocks is a land use change. Notes the S32 report states the tendency for higher stocking rates on smaller blocks and questions if this will become a perverse outcome.	Amend to consider if there are "perverse outcomes" when managing rural land use change.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		use change.			
S5.012	9 Te Awarua-o-Porirua Whaitua	Rule P.R26: Farming activities on 20 hectares or more of land - permitted activity.	Not Stated	Considers the small number of farms within the Whaitua contribute diversity, landscape and amenity values to Wellington area. Considers it important that farming in the whaitua has continued support.	Retain as notified.
S5.013	12 Schedules	B Freshwater Action Plan requirements.	Not Stated	Considers plans should: - support the inclusion of non-regulatory actions, - follow and promote best practice in planning and implementation, - include as determined in partnership with mana whenua, preparation at different scales (e.g. part Freshwater Management Units, whole Freshwater Management Units or smaller subcatchments) at the scale most useful to implementing actions and meeting the needs of mana whenua and the affected community, - ground-truth the state and trends of attributes, as appropriate, to identify and prioritise necessary actions, - recognise the value and necessity of integrated management planning and delivery.	Retain as notified.
S5.014	12 Schedules	B3 Necessary actions.	Not Stated	Considers private land owners should be given planning, financial and logistical support, to achieve objectives successful implementation of the plan change.	Retain as notified.
S5.015	12 Schedules	D Freshwater Action Plans in Te Awarua-o-	Support	Supports (3), (4), (5a).	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Porirua Whaitua			
S5.016	12 Schedules	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	Concerned Table D1 does not provide same variation in method for addressing sediment loss. Considers various risk factors are not taken into account by the single solution and may be better addressed through other methods. Considers there are other issues to be considered when looking at how sediment loss might be managed including reliability of mapping, practicalities of addressing highest erosion risk land areas, inclusion of land of lesser risk due to fencing, establishing outcomes wanted and whether one rule solution will meet the outcomes or lead to perverse outcomes, are issues related to managing sediment loss which need to considered.	Amend: In addition to the management objectives described in Part B of Schedule Z, the farm environment plan must demonstrate that ~~the~~ **appropriate and practicable erosion control treatment** measures **are** adopted to address the identified **sediment loss** risks ~~will result in the revegetation of highest erosion risk land (pasture), and treatment to address erosion risks on other land including high erosion risk land (pasture), with at least 50% of highest erosion risk land (pasture), being revegetated by 30 December 2033, and the remaining highest risk erosion land (pasture) being revegetated by 30 December 2040, unless this is not reasonably practicable, and a certifier certifies that alternative erosion control treatment over the balance of the property will result in the same a level~~ of soil loss avoidance **and that these are measurable at a farm-scale and consistent with achieving the target attribute states for the part FMU.**
S5.017	12 Schedules	E Erosion Risk Treatment Plan.	Amend	Considers the flexibility in solutions should be equal for both high and highest erosion risk land. Considers the difference should be higher level outcomes expected to meet attribute states within the treatment measures implemented and/or implementation of more measures to meet expected outcomes.	Amend: Remove Section 1)~~ A programme to ensure that 50% of the total area of any highest erosion risk land (pasture) on the property is in permanent woody vegetation within 10 years of the farm environment plan being certified, where permanent woody vegetation: (a) can reasonably be expected to reach canopy cover of at least 80% per hectare within 10 years of being established, and (b) is not plantation forestry, and (c) subject to meeting (a) and (b) above, may include appropriate planted species or species that may naturally regenerate.~~ 2. A programme of mitigations to ensure that the management of sediment loss from **highest and** high erosion risk land (pasture) meets the following management goals. 3. A programme of mitigations to ensure that the management of sediment loss from **highest and** high

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					erosion risk land (pasture) meets the following management goals: (a) Goal 1 - The effects of stock grazing on sediment loss are minimised by managing grazing density and stock types/weights (particularly during winter months) to reflect the increased risk on **highest and** high erosion risk land (pasture). (b) Goal 2 - The risk of sediment loss from critical source areas is minimised through identification of these areas, management of vegetation in and around these areas, stock grazing practices, and location and use of farm infrastructure. (c) Goal 3 - Land has appropriate soil conservation treatment to provide effective erosion control. (d) Goal 4 - The risk of sediment loss as a result of any earthworks permitted by the regional plan is minimised, including by compliance with Rules WH.R22/P.R20. (e) Goal 5 - The risk of sediment loss as a result of any vegetation clearance is not increased from associated land surface disturbance, and appropriate vegetation is established on the area as soon as practicable following any vegetation clearance. 4. A description of how the benefits of erosion control treatments will be maintained over time including by: (a) Restricting stock access to ensure effective establishment and protection of the woody vegetation ~~required by 1 above~~ or **other** mitigations implemented in accordance with 2 above, and (b) Implementing an animal and/or plant pest management programme.
S5.018	13 Maps	Map 90: Highest and high erosion risk land (Pasture) - Te	Oppose	Concerned the map doesn't take into account other sediment transport risk factors. Thinks the info in the map doesn't provide any meaningful relationship to actions to address sediment loss on highest erosion risk land.	Delete the map.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Awarua-o-Porirua.			

S102 Donald Love

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S102.001	9 Te Awarua-o-Porirua Whaitua	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Oppose	Considers only a small % of sediment is from highest erosion risk land (pasture) and is dwarfed by other sources. Suggests replacing pasture at low stocking rates with woody vegetation would not have a net negative outcome of sediment discharge.	Remove the mandatory requirement for 50% of permanent woody vegetation.
S102.002	9 Te Awarua-o-Porirua Whaitua	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Amend	Considers risks should be assessed as the impacts of another rotation on tracked and managed land could be worse than other options.	Seeks that there be no new forestry on highest erosion land but additional rotations of existing forestry should be considered on impacts.
S102.003	9 Te Awarua-o-Porirua Whaitua	Rule P.R26: Farming activities on 20 hectares	Amend	Concerned there is no definition of a "farm environment plan certifier" within the plan and that its not a commonly used NZ national role. Cites the GWRC process and acknowledges a number of people are certified. Suggests process could be	Seeks a change in Schedule 36 (b) to remove the woody vegetation requirement.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		or more of land - permitted activity.		costly and excessive for the scale of operation in this area.	
S102.004	12 Schedules	B Management objectives	Amend	Concerned any attempt to modify highly exposed land may have a net negative impact, particularly in shallow soils.	(b) define "land in a natural state". (d) make revegetation optional.
S102.005	12 Schedules	B Management objectives	Amend	Notes there is a perception that forestry has been a significant contributor to sediment discharge. Concerned that good management practices have not been well defined or monitored.	Retain B1.
S102.006	12 Schedules	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	Notes woody vegetation experiencing high winds can cause major soil disturbance and sediment release and that partially disturbed or rotted tree roots can initiate landslide on steep land.	Delete provision unless science supporting claim that erosion is worse without woody vegetation can be provided.
S102.007	12 Schedules	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te	Oppose	Considers it is not clear that replacing lightly stocked grassland with woody vegetation would achieve a net reduction in sediment.	Remove 50% total area in woody vegetation requirement or make it optional.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.			
S102.008	12 Schedules	Table D1. Financial contribution calculations for residential greenfield development	Amend	Suggests the plan should make it clear that responsibility for wild animals involves multiple agencies including GWRC.	Make clear that implementing control of pest plants and animals is also a requirement for GWRC.
S102.009	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Not Stated	Supports promoting updates of good management practice but suggests there is confusion about the boundary between good and bad management practice. Notes the GWRC Erosion and Sediment Control Guidelines guide is more related to discharge in relation to earthworks.	Retain C.

S037 Donald Skerman

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S37.001	2 Interpretation	Unplanned greenfield development	Support	Supports additional housing through infill of existing urban areas to better capitalise on existing infrastructure, reduce transport emissions and contamination of water resources.	Supports the prohibition of unplanned greenfield development, the requirement to treat 85% of stormwater on urban development sites, and the mandatory financial fee for greenfield developments.
S37.002	5.5 Water allocation rules	Rule R133: Gravel extraction for flood	Support	Disturbances to the riverbed should be minimised to reduce sediment, and work should be limited around periods where recreational use is most likely. The public should be notified when water is unsuitable for swimming due to these activities.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		protection purposes or erosion mitigation inside sites of significance - discretionary activity.			
S37.003	13 Maps	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Support	Considers additional housing unnecessary on this land to meet demand. Any development should be subject to an assessment of environmental issues, including carbon emissions, distance to public transport and elevation.	No decision requested but supports land that has been described as the "Southern Growth Area" by Upper Hutt City Council being included in the "Unplanned greenfield areas" colouring on the map
S37.004	13 Maps	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Oppose	Upper Hutt City Council is in the process of changing the zoning of this land to Natural Open Space (Plan change 49 Variation 1)	~~Seeks the deletion~~ The section to the North of the paper road extending from Kiln St known as Pt. Sec 82 or Silverstream Spur should be removed from the "Planned/existing urban areas"

S003 Dougal Morrison

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S3.001	General comments	General comments - overall	Not Stated	Considers there is no justification for bringing in changes to control forestry use beyond the NES' for Commercial Forestry.	Not stated.
S3.002	General comments	General comments - current legislation	Not Stated	Considers any reference to NES' for Plantation Forestry should be removed and replaced with NES' for Commercial Forestry (NES-CF).	Not stated.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S3.003	General comments	General comments - current legislation	Not Stated	Considers the NES-CF should be allowed to bed in before significant changes are made to the NRP	Not stated.
S3.004	General comments	General comments - overall	Not Stated	Changes go beyond the recommendations of the relevant Whaitua.	Not stated.
S3.005	General comments	General comments - water quality improvements	Not Stated	Considers GWRC has not provided scientific evidence that forests have caused significant degradation of freshwater quality in the Te Awarua-o-Porirua and Whanganui-a-tara catchments.	Not stated.
S3.006	General comments	General comments - rural	Not Stated	Considers the proposed erosion classification is unhelpful. Concerned the classification does not express the absolute risk, but rather the risk relative to all other agricultural land. Considers it better to use the ESC classification in the NES-CF.	Not stated.
S3.007	General comments	General comments - overall	Not Stated	Considers extra resources should be provided to a monitoring team, as per the Te Awarua-o-Porirua and Te Whanganui-a-tara Whaitua recommendations.	Not stated.
S3.008	General comments	General comments - overall	Not Stated	Concerned the Section 32 analysis doesn't justify the changes to forestry management rules.	Not stated.
S3.009	General comments	General comments - economic cost/impact	Not Stated	Considers the proposed changes will significantly impact forest investment in the Wellington Region and reduce the benefits from carbon sequestration.	Not stated.
S3.010	General comments	General comments – plantation forestry	Not Stated	Concerned this will result in unmanaged forests and associated problems.	Not stated.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S3.011	General comments	General comments - overall	Not Stated	Considers rules need to be appropriate to the type of forest being managed. Considers commercial forests using a continuous forest cover approach should be a permitted activity.	Not stated.
S3.012	General comments	General comments - overall	Not Stated	Considers GWRC has not provided scientific evidence that forests have caused any significant degradation of freshwater quality. States GWRC's objectives are broad and it will be difficult to determine whether new regulations for forestry will have a positive effect on water quality. Feels GWRC presents a biassed view of the role of forestry in the Section 32 report Considers there is no evidence that more stringent NES-CF will not achieve GWRC's water quality objectives and there is no reason to bring in greater controls than those in the NES-CF.	Not stated.
S3.013	General comments	General comments - overall	Not Stated	References recommendations from Te Awarua-o-Porirua WIP and Te Whanganui-a-Tara WIPs and considers these recommendations have not been followed and more complex and expensive regulations are now proposed.	Not stated.
S3.014	General comments	General comments - current legislation	Not Stated	References Section 5 and Section 85 of the RMA. Concerned the proposed plan will make it impossible for forestry owners to provide for their economic well-being or to make reasonable use of their land. Concerned that forestry owners will not be able to generate income post-harvest but costs, such as rates or maintenance costs for fences will continue. Concerned that forests will not be able to be harvested due to the conditions in the rules. Considers it is unlikely that the maximum sediment level of 100 gr/m3 will be able to be met. Considers that additional costs for planning, documentation,	Not stated.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				experts and consent fees may make it impossible to economically harvest a forest.	
S3.015	General comments	General comments – plantation forestry	Amend	Concerned if highly erodible land is unable to be re-planted post-harvest, the land will revert to unmanaged forests. Concerned this will create problems of trees falling into streams or causing shading of streams.	Seeks that: Replanting be a permitted activity subject to the permitted activity conditions in the NESCF The recommendations from Te Awarua-o-Porirua WIP (Recommendations 54 and 55), and the recommendation from Te Whanganui-a-Tara WIP (Recommendation 37) be adopted by Greater Wellington. Greater resources are provided to monitor harvesting activities.
S3.016	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry - controlled activity.	Oppose	Concerned if highly erodible land is unable to be re-planted post-harvest it will result in unmanaged forests and associated problems.	Delete Rule P.R19.
S3.017	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry - discretionary activity.	Oppose	Concerned if highly erodible land is unable to be re-planted post-harvest it will result in unmanaged forests and associated problems.	Delete Rule P.R20.
S3.018	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity.	Oppose	Concerned if highly erodible land is unable to be re-planted post-harvest it will result in unmanaged forests and associated problems.	Delete Rule P.R21.
S3.019	General comments	General comments - overall	Not Stated	Supports the New Zealand Farm Forestry Association Inc, and the Wellington Branch of the New Zealand Farm Forestry Associations' submissions.	Not stated.

S209 Enviro NZ Services Ltd (Enviro NZ)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S209.001	2 Interpretation	High risk industrial or trade premise	Support	Considers limiting the definition to premises that use contaminants that are exposed to rain does not penalise entirely internal operations and encourages good environmental outcomes	Not stated
S209.002	2 Interpretation	Impervious surfaces	Amend	Notes porous or permeable paving is repeated	....and excludes: grassed areas, gardens and other vegetated areas ~~porous or permeable paving~~ slatted decks which allow water to drain through to a permeable surface porous or permeable paving and living roofs • roof areas with rainwater collection and reuse any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)
S209.003	2 Interpretation	Stormwater treatment system	Amend	Considers complete removal of contaminants is not always practical, depending on the contaminants, the treatment train and weather conditions.	A device, structure or system used to ~~remove~~ **reduce** stormwater contaminants and/or...
S209.004	5.1 Air quality rules	Rule R42: All other discharges - discretionary activity.	Neutral	Not stated	Not stated
S209.005	5.2 and 5.3 Discharges to land and water and land use rules	Rule R48: Stormwater from an individual property - permitted activity.	Not Stated	Not stated	Not stated
S209.006	8 Whaitua Te Whanganui-a-Tara	Policy WH.P6: Cumulative adverse effects of	Amend	Notes clause (b)(i) requires all consent applications to have upgrades. Considers it inequitable to require upgrades for sites where suitable treatment is already in place and the target is met.	(b) (i) at a minimum, an application for a resource consent includes a defined programme of work for upgrading the discharge **(if target attribute state is not already met),** in accordance....

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		point source discharges.			
S209.007	8 Whaitua Te Whanganui-a-Tara	Policy WH.P7: Discharges to groundwater.	Neutral	Not stated	Not stated
S209.008	8 Whaitua Te Whanganui-a-Tara	Policy WH.P8: Avoiding discharges of specific products and waste.	Amend	Considers the definition of "untreated" is open to interpretation and would have unintended consequences. Considers there should be a volume threshold.	Provide clarity on untreated waste. Provide a volume threshold.
S209.009	8 Whaitua Te Whanganui-a-Tara	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Support	Not stated	Not stated
S209.010	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	Amend	Considers the imperative for hydrological control and WSUD measures should be removed, as they are not always required.	(b) **generally** using hydrological control and water sensitive urban design measures...

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S209.011	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Neutral	Not stated	Not stated
S209.012	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Questions the degree of maintenance or enhancement of stormwater quality required to meet the policy. Considers treatment may not always be necessary, particularly where increase in impervious areas is minimal.	Amend policy to allow for practical achievement and allow for where treatment is already in place.
S209.013	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Support	Not stated	Not stated
S209.014	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Neutral	Not stated	Not stated
S209.015	8 Whaitua Te	Policy WH.P31:	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	Winter shut down of earthworks.			
S209.016	8 Whaitua Te Whanganui-a-Tara	Rule WH.R1: Point source discharges of specific contaminants - prohibited activity.	Neutral	Considers enforcement may be difficult, noting that accidental spills would be prohibited. Questions how natural disasters are treated and assumes liability lies with the land owner when the discharge may have resulted from a spill after a medical event of a visitor for example.	Not stated
S209.017	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Support	Not stated	Retain as notified.
S209.018	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Support	Not stated	Retain as notified.
S209.019	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an	Support	Considers the rule appropriate for existing high risk ITA's.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		existing high risk industrial or trade premise - permitted activity.			
S209.020	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Considers requirement for hydrological control onerous for a 30m2 increase. Considers there must be a trigger for hydrological control, particularly where it is existing or there is off-site capacity for the increase.	Replace (c) with a standard that requires retention for a particular runoff depth for the threshold increase/redevelopment.
S209.021	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Neutral	Not stated	Not stated
S209.022	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		areas - controlled activity.			
S209.023	8 Whaitua Te Whanganui-a-Tara	Rule WH.R8: Stormwater from a port or airport - restricted discretionary activity.	Neutral	Not stated	Not stated
S209.024	8 Whaitua Te Whanganui-a-Tara	Rule WH.R9: Stormwater from a local authority or state highway network- restricted discretionary activity.	Neutral	Not stated	Not stated
S209.025	8 Whaitua Te Whanganui-a-Tara	Rule WH.R10: Stormwater from new state highways- discretionary activity.	Neutral	Not stated	Not stated
S209.026	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redevelop	Amend	Seeks clarification on how activities are prohibited under WH.R13, but discretionary under WH.R11.	Amend rule to clarify how rule applies.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		ed impervious surfaces - discretionary activity.			
S209.027	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Neutral	Not stated	Not stated
S209.028	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Neutral	Not stated	Not stated
S209.029	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Support	Not stated	Not stated
S209.030	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S209.031	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Support	Not stated	Not stated
S209.032	9 Te Awarua-o-Porirua Whaitua	Policy P.P5: Localised adverse effects of point source discharges.	Support	Not stated	Not stated
S209.033	9 Te Awarua-o-Porirua Whaitua	Policy P.P6: Point source discharges.	Amend	Notes clause (b)(i) requires all consent applications to have upgrades. Considers it inequitable to require upgrades for sites where suitable treatment is already in place and the target is met.	(b) (i) at a minimum, an application for a resource consent includes a defined programme of work for upgrading the discharge **(if target attribute state is not already met),** in accordance....
S209.034	9 Te Awarua-o-Porirua Whaitua	Policy P.P7 Discharges to groundwater.	Support	Not stated	Not stated
S209.035	9 Te Awarua-o-Porirua Whaitua	Policy P.P8 Avoiding discharges of specific products and waste.	Amend	Considers the definition of "untreated" is open to interpretation and would have unintended consequences. Considers there should be a volume threshold.	Amend to provide clarity on untreated waste. Provide a volume threshold.
S209.036	9 Te Awarua-o-Porirua Whaitua	Policy P.P9: General stormwate	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		r policy to achieve the target attribute states and coastal water objectives.			
S209.037	9 Te Awarua-o-Porirua Whaitua	Policy P.P10: Managing adverse effects of stormwater discharges.	Amend	Considers the imperative for hydrological control and WSUD measures should be removed, as they are not always required.	(b) **generally** using hydrological control and water sensitive urban design measures...
S209.038	9 Te Awarua-o-Porirua Whaitua	Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises.	Neutral	Not stated	Not stated
S209.039	9 Te Awarua-o-Porirua Whaitua	Policy P.P13: Stormwater discharges from new and redeveloped	Amend	Questions the degree of maintenance or enhancement of stormwater quality required to meet the policy. Considers treatment may not always be necessary, particularly where increase in impervious areas is minimal.	Amend policy to allow for practical achievement and allow for where treatment is already in place.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		impervious surfaces.			
S209.040	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Support	Not stated	Retain as notified
S209.041	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Neutral	Not stated	Not stated
S209.042	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Neutral	Not stated	Not stated
S209.043	9 Te Awarua-o-Porirua Whaitua	Rule P.R1: Point source discharges of specific contaminants - prohibited activity.	Neutral	Considers enforcement may be difficult, noting that accidental spills would be prohibited. Questions how natural disasters are treated and assumes liability lies with the land owner when the discharge may have resulted from a spill after a medical event of a visitor for example.	Not stated
S209.044	9 Te Awarua-o-Porirua Whaitua	Rule P.R2: Stormwater to land - permitted activity.	Support	Not stated	Retain as notified
S209.045	9 Te Awarua-	Rule P.R3: Stormwate	Support	Not stated	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	r from an existing individual property to surface water or coastal water - permitted activity.			
S209.046	9 Te Awarua-o-Porirua Whaitua	Rule P.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Support	Not stated	Retain as notified
S209.047	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Considers requirement for hydrological control onerous for a 30m2 increase. Considers there must be a trigger for hydrological control, particularly where it is existing or there is off-site capacity for the increase.	Replace (c) with a standard that requires retention for a particular runoff depth for the threshold increase/redevelopment.
S209.048	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S209.049	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas-controlled activity.	Neutral	Not stated	Not stated
S209.050	9 Te Awarua-o-Porirua Whaitua	Rule P.R8: Stormwater from a local authority or state highway network-restricted discretionary activity.	Neutral	Not stated	Not stated
S209.051	9 Te Awarua-o-Porirua Whaitua	Rule P.R9: Stormwater from new state highways-discretionary activity.	Neutral	Not stated	Not stated
S209.052	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped	Amend	Seeks clarification on how activities are prohibited under WH.R13, but discretionary under P.R10.	Amend rule to clarify how rule applies.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		impervious surfaces-discretionary activity.			
S209.053	9 Te Awarua-o-Porirua Whaitua	Rule P.R11: All other stormwater discharges - non-complying activity.	Neutral	Not stated	Not stated
S209.054	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Neutral	Not stated	Not stated
S209.055	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Support	Not stated	Not stated
S209.056	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S209.057	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks - non-complying activity.	Support	Not stated	Not stated
S209.058	12 Schedules	Schedule 28: Stormwater Contaminant Treatment.	Amend	Notes the schedule only offers bioretention devices, wetlands and swales as treatment options to achieve the target load reduction for copper and zinc. Seeks the role of industry good practice is better recognised, particularly where other treatment or prevention methods may be suitable.	Amend schedule to better reflect using industry best practice.
S209.059	12 Schedules	Table 1: Target load Reductions for Copper and Zinc	Neutral	Not stated	Not stated
S209.060	12 Schedules	Table 2: Additional Devices and Specified Load Reductions for Copper and Zinc	Neutral	Not stated	Not stated
S209.061	12 Schedules	Schedule 29: Stormwater Impact Assessments.	Amend	Notes WSUD is not always possible on existing industrial sites. Considers clause 8 should not be an obligation in every case. Considers consultation should not be necessary where Freshwater Actions Plans are met.	Amend schedule to allow for existing industrial sites where water sensitive design principles cannot always be used. Delete Clause 8.

S222 Environmental Defence Society Inc.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S222.001	2 Interpretation	Afforestation	Amend	Refers to outdated regulations.	Refer to updated regulations - NES-CF.
S222.002	2 Interpretation	Earthworks	Amend	Refers to outdated regulations.	Refer to updated regulations - NES-CF.
S222.003	2 Interpretation	Harvesting	Amend	Refers to outdated regulations.	Refer to updated regulations - NES-CF.
S222.004	2 Interpretation	Mechanical land preparation	Amend	Refers to outdated regulations.	Refer to updated regulations - NES-CF.
S222.005	2 Interpretation	Nationally threatened freshwater species	Amend	Does not align with NPSFM, which is "threatened species".	Amend to "threatened species".
S222.006	2 Interpretation	Replanting	Amend	Refers to outdated regulations	Refer to updated regulations - NES-CF.
S222.007	2 Interpretation	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)	Amend	Refers to outdated regulations	Refer to updated regulations - NES-CF.
S222.008	3 Objectives	Table 3.4 Rivers and Streams.	Amend	Considers parameters in Table 3.4 for water quality are relevant to the Whaitua and have not been carried over to the new target tables.	Retain the application of nuisance macrophytes, periphyton cover, toxicants, and mahinga kai targets to the new Whaitua chapters.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S222.009	3 Objectives	Table 3.6 Groundwater.	Amend	No replacement targets have been provided for the Whaitua.	Retain application of Table 3.6 to the Whaitua.
S222.010	3 Objectives	Table 3.7 Natural wetlands.	Amend	No replacement targets have been provided for the Whaitua.	Retain application of Table 3.7 to the Whaitua.
S222.011	3 Objectives	Objective O25: Outstanding water bodies identified in Schedule A (outstanding water bodies) and their significant values are protected and restored.	Support	Protects ecosystem and indigenous biodiversity health.	Not stated
S222.012	3 Objectives	Objective O28: Ecosystems and habitats with significant indigenous biodiversity values are protected from the adverse	Support	Protects ecosystem and indigenous biodiversity health.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		effects of use and developm ent, and where appropriat e restored to a healthy functioning state including as defined by Tables 3.4, 3.5, 3.6, 3.7 and 3.8.			
S222.013	5.4 Beds of lakes and rivers	Rule R128: New structures - permitted activity.	Amend	To give effect to Policies 7 and 9 NPSFM and Policy 30 NRP.	Ensure that activities avoid the loss of river extent and values and that the habitats of indigenous species are protected. Introduce TASs for habitat, natural form and character which activities must achieve.
S222.014	5.4 Beds of lakes and rivers	Rule R133: Gravel extraction for flood protection purposes or erosion mitigation inside sites of significanc e - discretiona ry activity.	Amend	To give effect to NPSFM.	Include Schedules A1 - A3 in Rule R133 so that activities inside a scheduled area require discretionary consent.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S222.015	6 Other methods	Method M36: Freshwater Action Plan programme.	Support	Gives effect to NPSFM.	Not stated
S222.016	6 Other methods	Method M37: Freshwater Action Plan for the Parangarahu Lakes.	Support	Gives effect to NPSFM.	Not stated
S222.017	6 Other methods	Method M38: Freshwater Action Plan for the Rangituhi catchment.	Support	Gives effect to NPSFM.	Not stated
S222.018	6 Other methods	Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganu	Support	Gives effect to NPSFM.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		i-a-Tara and Te Awarua-o-Porirua Whaitua.			
S222.019	6 Other methods	Method M41: Identifying and responding to degradation in freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Support	Gives effect to NPSFM.	Not stated
S222.020	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Amend	To give effect to NPSFM.	Include reference to "wetlands" in the chapter.
S222.021	6 Other methods	Method M45: Funding of wastewater and stormwate	Support	To give effect to NPSFM.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		r network upgrades			
S222.022	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.	Amend	To give effect to NPSFM.	Delete "Note" so that the wai ora state has legal effect as part of the objective. Amend 2100 to 2050 to reflect the urgency of addressing freshwater issues and the biodiversity crisis.
S222.023	8 Whaitua Te Whanganui-a-Tara	Objective WH.O2: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands and their margins are on a	Amend	Consistency with and to give effect to NPSFM.	Include reference to natural form and character in the objective (under (a)) and refer to ecosystem health as it is more consistent with NPSFM. Amend 2040 to 2030 to reflect the urgency of addressing freshwater issues and the biodiversity crisis.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		trajectory of measurable improvement towards wai ora.			
S222.024	8 Whaitua Te Whanganui-a-Tara	Objective WH.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved to achieve the coastal water objectives set out in Table 8.1.	Amend	To give effect to NPSFM.	Amend 2040 to 2030 to reflect the urgency of addressing freshwater issues and the biodiversity crisis.
S222.025	8 Whaitua Te Whanganui-a-Tara	Table 8.1 Coastal water objectives.	Amend	Considers key coastal water quality parameters are missing and more stringent timeframes are required.	Include a parameter for Turbidity. Wording for parameter is as follows:**Unit: NTU; Statistic: Turbidity must be maintained at or below the current annual median or at or below pre-existing levels, whichever is lesser; Te Whanganui-a-Tara Harbour and estuaries, Makara Estuary, Wainuiomata Estuary: <6.9; Wai Tai: No discernible change).**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					Add further parameters (for example lead, dissolved oxygen, temperature, pH, secchi depth, chlorophyll-a, total phosphorous, total nitrogen, nitrite-nitrate nitrogen, ammoniacal nitrogen, and faecal coliforms) to ensure narrative objectives in Table 3.8 of the Operative Plan are met. Amend Wai Tai unit for Enterococci: ~~<200~~ **<40** Add interim timeframes as per NPSFM 3.11.
S222.026	8 Whaitua Te Whanganui-a-Tara	Objective WH.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased and the long-term population numbers of these species and the area over which they occur are increased, improving	Amend	Considers it does not align with NPSFM, which is "threatened species".	Amend to **"threatened species".**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		their threat classification status.			
S222.027	8 Whaitua Te Whanganui-a-Tara	Objective WH.O5: By 2040 the health and wellbeing of the Parangarahu Lakes and associated natural wetlands are on a trajectory of improvement towards wai ora.	Amend	To give effect to NPSFM.	Amend 2040 to 2030 to reflect the urgency of addressing freshwater issues and the biodiversity crisis.
S222.028	8 Whaitua Te Whanganui-a-Tara	Table 8.2 Target attribute states for lakes.	Amend	Not stated	Include the attributes from Table 3.5 which previously applied but have not been carried over - including sediment, mahinga kai, fish, and macroalgae. Amend the timeframe for achievement of states to 2030.
S222.029	8 Whaitua Te Whanganui-a-Tara	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	Support	Gives effect to NPSFM.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S222.030	8 Whaitua Te Whanganui-a-Tara	Objective WH.O7: The physical integrity of aquitards is protected so that confined aquifer pressures are maintained.	Support	Gives effect to NPSFM.	Not stated
S222.031	8 Whaitua Te Whanganui-a-Tara	Objective WH.O8: Primary contact sites within Te Awa Kairangi/Hutt River, Pākuratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact.	Amend	To give effect to NPSFM.	Amend 2040 to 2030 to reflect the urgency of addressing freshwater issues and the biodiversity crisis.
S222.032	8 Whaitua Te Whanganui-a-Tara	Objective WH.O9: Water quality,	Amend	To give effect to NPSFM.	Amend chapeau to include natural form and character.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		habitats, water quantity and ecological processes of rivers are maintained or improved.			
S222.033	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Amend	Unsure what river types are covered by each part FMU and is concerned about some of the attribute targets, namely periphyton, nitrate, DIN, and MCI. Unsure how fish community health is to be determined and how this differs to IBI. The attributes for habitat and natural form and character, groundwater and macrophyte targets are missing. Seeks interim timeframes of less than 10 years are required where long term timeframes are set out.	State river type and class for each of the part FMUs. Set a minimum target state for periphyton biomass for all part FMUs at NPSFM band of 120 mg chl-a (and retain higher targets where included). Amend nitrate toxicity target to be NPSFM 'A' band for all part FMUs. Retain DIN target states where they are set below 0.3 mg/L. Amend others to be 0.3 mg/L (median) for good rivers (type 1 and 4) 0.6 for medium rivers (type 2 and 3) and 1.0 for poor rivers (type 5 & 6). Minimum DIN target should be no higher than 1.0. Clearly define what fish community health as determined by experts actually means. Set higher targets for MCI attributes. Retain 'nuisance macrophytes', 'periphyton cover', mahinga kai, and toxicants attributes from table 3.4. Retain groundwater attributes from table 3.6. Amend table (or add another table) to include target attribute states for habitat and natural form and character using the

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					Habitat Quality / Natural Character Index. Minimum targets should set out a target of maintenance of habitat quality / natural character (e.g., minimum ratio of current: reference condition of 0.85). Amend target timeframe to 2030 and outline date from which maintenance will be continued (as per NPSFM 3.11). If date remains 2040, set out interim states at no longer than 10-year intervals.
S222.034	8 Whaitua Te Whanganui-a-Tara	Policy WH.P1: Improvement of aquatic ecosystem health.	Amend	To give effect to NPSFM.	Amend (b) to read **"restoring habitats and natural form and character".**
S222.035	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	To give effect to NPSFM.	Amend (f) to require avoidance of significant adverse effects from earthworks, forestry and vegetation clearance activities. Support removal of stock from waterbodies and the coastal environment.
S222.036	8 Whaitua Te Whanganui-a-Tara	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of	Support	Gives effect to NPSFM.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		waterways.			
S222.037	8 Whaitua Te Whanganui-a-Tara	Policy WH.P4: Achievement of the visual clarity target attribute states.	Support	Gives effect to NPSFM.	Not stated
S222.038	8 Whaitua Te Whanganui-a-Tara	Table 8.5: Sediment load reductions required to achieve the visual clarity target attribute states.	Amend	Gives effect to NPSFM.	Amend 2040 to 2030 to reflect the urgency of addressing freshwater issues and the biodiversity crisis.
S222.039	8 Whaitua Te Whanganui-a-Tara	Policy WH.P6: Cumulative adverse effects of point source discharges.	Support	Gives effect to NPSFM.	Not stated
S222.040	8 Whaitua Te Whanganui-a-Tara	Policy WH.P17: General wastewater policy to achieve target	Support	Gives effect to NPSFM.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		attribute states and coastal objectives.			
S222.041	8 Whaitua Te Whanganui-a-Tara	Policy WH.P18: Progressing works to meet Escherichia coli target attribute states.	Support	Gives effect to NPSFM.	Not stated
S222.042	8 Whaitua Te Whanganui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Support	Gives effect to NPSFM.	Not stated
S222.043	8 Whaitua Te Whanganui-a-Tara	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Amend	To give effect to NPSFM.	Enable controls on smaller rural properties even if they are not intensively farmed.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S222.044	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Support	Gives effect to NPSFM.	Not stated
S222.045	8 Whaitua Te Whanganui-a-Tara	Policy WH.P24: Phasing of farm environment plans.	Amend	To give effect to NPSFM.	Amend to include deposited sediment.
S222.046	8 Whaitua Te Whanganui-a-Tara	Policy WH.P26: Managing livestock access to small rivers.	Support	To give effect to NPSFM.	Not stated
S222.047	8 Whaitua Te Whanganui-a-Tara	Policy WH.P27: Promoting stream shading.	Amend	To give effect to NPSFM.	Consider requiring progressive shading, not just promoting.
S222.048	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment	Amend	To give effect to NPSFM.	Require setbacks, alternative harvesting methods that do not clear fell trees and spatially and/or temporally limit harvesting.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discharges from plantation forestry.			
S222.049	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Amend	To give effect to NPSFM.	Require setbacks.
S222.050	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Support	To give effect to NPSFM.	Not stated
S222.051	8 Whaitua Te Whanganui-a-Tara	Policy WH.P32: Minimum flows and minimum water levels in Whaitua Te Whanganui-a-Tara.	Support	Considers 90% of MALF is consistent with the proposed NES on Ecological Flows and Water Levels.	Not stated
S222.052	8 Whaitua Te Whanganui-a-Tara	Policy WH.P33: Core allocation in Whaitua Te Whanganui-a-Tara.	Not Stated	To give effect to NPSFM.	Not stated
S222.053	8 Whaitua Te	Rule WH.R1:	Support	To give effect to NPSFM.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	Point source discharges of specific contaminants - prohibited activity.			
S222.054	8 Whaitua Te Whanganui-a-Tara	Rule WH.R14: Wastewater network catchment discharges - restricted discretionary activity.	Support	Gives effect to NPSFM.	Not stated
S222.055	8 Whaitua Te Whanganui-a-Tara	Rule WH.R15: Existing wastewater discharges from a treatment plant - discretionary activity.	Support	Gives effect to NPSFM.	Not stated
S222.056	8 Whaitua Te Whanganui-a-Tara	Rule WH.R16: All other discharges of wastewater - non-complying activity.	Support	Gives effect to NPSFM.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S222.057	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity.	Amend	To give effect to NPSFM and comply with RMA.	Make a controlled activity or alternatively amend permitted activity standards to avoid sedimentation of receiving waterbodies and the coastal marine area.
S222.058	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land - controlled activity.	Amend	To give effect to NPSFM and comply with RMA.	Make a discretionary or restricted discretionary activity to ensure the avoidance of adverse sedimentation effects associated with the clearance.
S222.059	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance - discretionary activity.	Amend	To give effect to NPSFM and comply with RMA.	"Vegetation clearance" is defined to not include commercial forest trees. Need to clarify whether Rules WH.R17 - 20 apply to commercial forestry activities. The "Note" in Rule WH R19 says that the rules prevail over the NES-PF but those rules relate to commercial harvesting. EDS supports the NRP imposing greater stringency than the NES-PF and NES-CF.
S222.060	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Amend	To give effect to NPSFM and comply with RMA.	Make a discretionary or restricted discretionary activity.
S222.061	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry -	Amend	To give effect to NPSFM and comply with RMA.	Amend as consequence of changes to Rule WH.20

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discretionary activity.			
S222.062	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.	Support	Gives effect to NPSFM.	Not stated
S222.063	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	To give effect to NPSFM and comply with RMA.	Considers greater setback from waterbodies and coastal marine area is required. Also need to clarify interaction of rule with NES-PF/CF.
S222.064	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	To give effect to NPSFM and comply with RMA.	Make a discretionary activity. Also need to clarify interaction of rule with NES-PF/CF.
S222.065	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Support	Gives effect to NPSFM.	Not stated
S222.066	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares	Amend	To give effect to NPSFM and comply with RMA.	Amend list to include "annual nitrogen fertiliser use, the annual stocking rate, and the winter stocking rate is provided to Wellington Regional Council annually."

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and 20 hectares - permitted activity.			
S222.067	8 Whaitua Te Whanganui-a-Tara	Table 8.6: Phase-in of farm environment plans for part Freshwater Management Units.	Support	Gives effect to NPSFM.	Not stated
S222.068	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Support	Gives effect to NPSFM.	Not stated
S222.069	8 Whaitua Te Whanganui-a-Tara	Rule WH.R29: Livestock access to a small river - discretionary activity.	Support	Gives effect to NPSFM.	Not stated
S222.070	8 Whaitua Te Whanganui-a-Tara	Rule WH.R30: The use of land for farming activities - discretionary activity.	Support	Gives effect to NPSFM.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S222.071	8 Whaitua Te Whanganui-a-Tara	Rule WH.R31: Change of rural land use - discretionary activity.	Support	Gives effect to NPSFM.	Not stated
S222.072	8 Whaitua Te Whanganui-a-Tara	Rule WH.R32: Farming activities - non-complying activity.	Support	Gives effect to NPSFM.	Not stated
S222.073	8 Whaitua Te Whanganui-a-Tara	Rule WH.R35: Take and use of water from outstanding rivers or lakes - non-complying activity.	Support	Gives effect to NPSFM.	Not stated
S222.074	8 Whaitua Te Whanganui-a-Tara	Rule WH.R36: Take and use of water exceeding minimum flows or core allocation - prohibited activity.	Support	Gives effect to NPSFM.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S222.075	9 Te Awarua-o-Porirua Whaitua	Objective P.O1: The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100.	Amend	To give effect to NPSFM.	Delete ~~"Note"~~ so wai ora state has legal effect as part of the objective. Amend 2100 to 2050 to reflect the urgency of addressing freshwater issues and the biodiversity crisis.
S222.076	9 Te Awarua-o-Porirua Whaitua	Objective P.O2: Te Awarua-o-Porirua's groundwater, rivers, lakes and natural wetlands, and their margins are on a trajectory of measurable	Amend	Consistency with and to give effect to NPSFM.	Include reference to natural form and character in the objective (under (a)) and refer to ecosystem health as it is more consistent with NPSFM. Amend 2040 to 2030 to reflect the urgency of addressing freshwater issues and the biodiversity crisis.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		improvement towards wai ora.			
S222.077	9 Te Awarua-o-Porirua Whaitua	Objective P.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Pāuatahanui Inlet, Onepoto Arm and the open coastal areas of Te Awarua-o-Porirua is maintained or improved to achieve the coastal water objectives set out in Table 9.1.	Amend	To give effect to NPSFM.	Amend 2040 to 2030 to reflect the urgency of addressing freshwater issues and the biodiversity crisis.
S222.078	9 Te Awarua-o-Porirua Whaitua	Table 9.1: Coastal water objectives.	Amend	Recommends amending Table 9.1 to include further parameters and more stringent timeframes.	Include a parameter for Turbidity. Wording for parameter is as follows:**Unit: NTU; Statistic: Turbidity must be maintained at or below the current annual median or at or below pre-existing levels, whichever is lesser; Te Whanganui-a-Tara Harbour and estuaries, Makara**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					Estuary, Wainuiomata Estuary: <6.9; Wai Tai: No discernible change. Add further parameters (for example lead, dissolved oxygen, temperature, pH, secchi depth, chlorophyll-a, total phosphorous, total nitrogen, nitrite-nitrate nitrogen, ammoniacal nitrogen, and faecal coliforms) to ensure narrative objectives in Table 3.8 of the Operative Plan are met. Amend Wai Tai unit for Enterococci: ~~<200~~ **<40** Add interim timeframes as per NPSFM 3.11.
S222.079	9 Te Awarua-o-Porirua Whaitua	Table 9.2: Target attribute states for rivers.	Amend	Unsure what river types are covered by each part FMU and is concerned about some of the attribute targets, namely periphyton, nitrate, DIN, and MCI. Unsure how fish community health is to be determined and how this differs to IBI. The attributes for habitat and natural form and character, groundwater and macrophyte targets are missing. Seeks interim timeframes of less than 10 years are required where long term timeframes are set out.	State river type and class for each of the part FMUs. Set a minimum target state for periphyton biomass for all part FMUs at NPSFM band of 120 mg chl-a (and retain higher targets where included). Amend nitrate toxicity target to be NPSFM 'A' band for all part FMUs. Retain DIN target states where they are set below 0.3 mg/L. Amend others to be 0.3 mg/L (median) for good rivers (type 1 and 4) 0.6 for medium rivers (type 2 and 3) and 1.0 for poor rivers (type 5 & 6). Minimum DIN target should be no higher than 1.0. Clearly define what fish community health as determined by experts actually means. Set higher targets for MCI attributes Retain 'nuisance macrophytes', 'periphyton cover', mahinga kai, and toxicants attributes from table 3.4 Retain groundwater attributes from table 3.6

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					Amend table (or add another table) to include target attribute states for habitat and natural form and character using the Habitat Quality / Natural Character Index. Minimum targets should set out a target of maintenance of habitat quality / natural character (e.g., minimum ratio of current: reference condition of 0.85). Amend target timeframe to 2030 and outline date from which maintenance will be continued (as per NPSFM 3.11). If date remains 2040, set out interim states at no longer than 10-year intervals.
S222.080	9 Te Awarua-o-Porirua Whaitua	Policy P.P1: Improvement of aquatic ecosystem health.	Amend	To give effect to NPSFM.	Amend (b) to read **"restoring habitats and natural form and character"**
S222.081	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	To give effect to NPSFM.	Amend (f) to require avoidance of significant adverse effects from earthworks, forestry and vegetation clearance activities
S222.082	9 Te Awarua-o-Porirua Whaitua	Table 9.3: Harbour arm catchment contaminant load	Amend	To give effect to NPSFM.	Amend 2040 to 2030 to reflect the urgency of addressing freshwater issues and the biodiversity crisis

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		reductions .			
S222.083	9 Te Awarua-o-Porirua Whaitua	Policy P.P6: Point source discharges .	Support	Gives effect to NPSFM.	Not stated
S222.084	9 Te Awarua-o-Porirua Whaitua	Policy P.P16: General wastewater policy to achieve target attribute states and coastal water objectives.	Support	Gives effect to NPSFM.	Not stated
S222.085	9 Te Awarua-o-Porirua Whaitua	Policy P.P17: Progressing works to meet Escherichia coli target attribute states.	Support	Gives effect to NPSFM.	Not stated
S222.086	9 Te Awarua-o-Porirua Whaitua	Policy P.P20: Managing diffuse discharges of nutrients and	Support	Gives effect to NPSFM.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Escherichia coli from farming activities.			
S222.087	9 Te Awarua-o-Porirua Whaitua	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Amend	To give effect to NPSFM.	Enable controls on smaller rural properties even if they are not intensively farmed
S222.088	9 Te Awarua-o-Porirua Whaitua	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Support	Gives effect to NPSFM.	Not stated
S222.089	9 Te Awarua-o-Porirua Whaitua	Policy P.P23: Phasing of farm environment plans.	Amend	To give effect to NPSFM.	Amend to include deposited sediment
S222.090	9 Te Awarua-	Policy P.P25:	Amend	To give effect to NPSFM.	Consider requiring progressive shading, not just promoting

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	Promoting stream shading.			
S222.091	9 Te Awarua-o-Porirua Whaitua	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Amend	To give effect to NPSFM.	Require setbacks, alternative harvesting methods that do not clear fell trees and spatially and/or temporally limit harvesting
S222.092	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Amend	To give effect to NPSFM.	Require setbacks
S222.093	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Support	Gives effect to NPSFM.	Not stated
S222.094	9 Te Awarua-o-Porirua Whaitua	Policy P.P30: Minimum flows and minimum water levels in Te Awarua-o-Porirua Whaitua.	Support	Considers 90% of MALF is consistent with the proposed NES on Ecological Flows and Water Levels.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S222.095	9 Te Awarua-o-Porirua Whaitua	Rule P.R1: Point source discharges of specific contaminants - prohibited activity.	Support	To give effect to NPSFM.	Not stated
S222.096	9 Te Awarua-o-Porirua Whaitua	Rule P.R13: Wastewater network catchment discharges to water - restricted discretionary activity.	Support	Gives effect to NPSFM.	Not stated
S222.097	9 Te Awarua-o-Porirua Whaitua	Rule P.R14: Existing wastewater discharges from a treatment plant to coastal and freshwater - discretionary activity.	Support	Gives effect to NPSFM.	Not stated
S222.098	9 Te Awarua-o-Porirua Whaitua	Rule P.R15: All other discharges	Support	Gives effect to NPSFM.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		of wastewater - non-complying activity.			
S222.099	9 Te Awarua-o-Porirua Whaitua	Rule P.R16: Vegetation clearance on highest erosion risk land-permitted activity.	Amend	To give effect to NPSFM and comply with RMA.	Make a controlled activity or amend permitted activity standards to avoid sedimentation of receiving waterbodies and the coastal marine area.
S222.100	9 Te Awarua-o-Porirua Whaitua	Rule P.R17: Vegetation clearance on highest erosion risk land - controlled activity.	Amend	To give effect to NPSFM and comply with RMA.	Make a discretionary or restricted discretionary activity to ensure the avoidance of adverse sedimentation effects associated with the clearance.
S222.101	9 Te Awarua-o-Porirua Whaitua	Rule P.R18: Vegetation clearance - discretionary activity.	Amend	To give effect to NPSFM and comply with RMA.	"Vegetation clearance" is defined to not include commercial forest trees. Need to clarify whether Rules WH.R17 - 20 apply to commercial forestry activities. The "Note" in Rule WH R19 says that the rules prevail over the NES-PF but those rules relate to commercial harvesting. EDS supports the NRP imposing greater stringency than the NES-PF and NES-CF
S222.102	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry - controlled activity.	Amend	To give effect to NPSFM and comply with RMA.	Make a discretionary or restricted discretionary activity
S222.103	9 Te Awarua-	Rule P.R20:	Amend	To give effect to NPSFM and comply with RMA.	Amend as a consequence of changes to Rule WH.20

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	Plantation forestry - discretionary activity.			
S222.104	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity.	Support	Gives effect to NPSFM.	Not stated
S222.105	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Amend	To give effect to NPSFM and comply with RMA.	Considers a greater setback from waterbodies and the coastal marine area is required. Also need to clarify interaction of rule with NES-PF/CF.
S222.106	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Amend	To give effect to NPSFM and comply with RMA.	Make a discretionary activity. Clarify the interaction of rule with NES-PF/CF.
S222.107	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks - non-complying activity.	Support	Gives effect to NPSFM.	Not stated
S222.108	9 Te Awarua-o-Porirua Whaitua	Rule P.R25: Farming activities on properties	Amend	To give effect to NPSFM and comply with RMA.	Amend list to include "annual nitrogen fertiliser use, the annual stocking rate, and the winter stocking rate is provided to Wellington Regional Council annually."

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		of between 4 hectares and 20 hectares - permitted activity.			
S222.109	9 Te Awarua-o-Porirua Whaitua	Table 9.5: Phase in of farm environment plans for Part Freshwater Management Units.	Support	Gives effect to NPSFM.	Not stated
S222.110	9 Te Awarua-o-Porirua Whaitua	Rule P.R27: The use of land for farming activities - discretionary activity.	Support	Gives effect to NPSFM.	Not stated
S222.111	9 Te Awarua-o-Porirua Whaitua	Rule P.R28: Change of rural land use - discretionary activity.	Support	Gives effect to NPSFM.	Not stated
S222.112	9 Te Awarua-o-Porirua Whaitua	Rule P.R29: Farming activities - non-	Support	Gives effect to NPSFM.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		complying activity.			
S222.113	9 Te Awarua-o-Porirua Whaitua	Rule P.R30: Take and use of water - permitted activity.	Amend	Not stated	Add an additional clause:**(x) the rate of take from a river does not exceed whichever is the lesser of:** **a) 10% of the instantaneous flow at the point and time of take, or** **b) An absolute limit of 2.5 l/s.**
S222.114	9 Te Awarua-o-Porirua Whaitua	Rule P.R33: Taking and use of water that exceeds minimum flows or allocation amounts - prohibited activity.	Support	Gives effect to NPSFM.	Not stated
S222.115	12 Schedules	Schedule A: Outstanding water bodies	Amend	Considers outstanding water bodies need to be listed and mapped.	List and map outstanding water bodies in the area that are streams, rivers and wetlands, including Te Awakairangi, the Akatarawa River, and the Pakuratahi River.
S222.116	12 Schedules	Schedule A2: Lakes with outstanding indigenous ecosystem values.	Amend	Considers further detail is required to ensure values can be protected.	List Indigenous fish diversity as a value of Lake Wairarapa (Wairarapa Moana). Note threatened fish species known to be present for each lake.
S222.117	12 Schedules	Schedule F: Ecosystems and	Amend	Considers additional detail from the DOC report on habitat requirements of native fish is required.	Consider including additional detail in the soon-to-be published DOC literature review of habitat requirements of native fish species.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		habitats with significant indigenous biodiversity values.			
S222.118	12 Schedules	Schedule F1: Rivers and lakes with significant indigenous ecosystems.	Support	Gives effect to NPSFM and complies with RMA.	Not stated
S222.119	12 Schedules	Schedule F2a: Significant habitats for indigenous birds in rivers.	Support	Gives effect to NPSFM and complies with RMA.	Not stated
S222.120	12 Schedules	Schedule F2b: Significant habitats for indigenous birds in lakes.	Support	Gives effect to NPSFM and complies with RMA.	Not stated
S222.121	12 Schedules	Schedule F2c: Significant habitats for indigenous birds in the coastal	Support	Gives effect to NPSFM and complies with RMA.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		marine area.			
S222.122	12 Schedules	Schedule F4: Sites with significant indigenous biodiversity values in the coastal marine area.	Support	Gives effect to NPSFM and complies with RMA.	Not stated
S222.123	12 Schedules	Schedule F5: Habitats with significant indigenous biodiversity values in the coastal marine area.	Support	Gives effect to NPSFM and complies with RMA.	Not stated
S222.124	12 Schedules	Schedule 27: Freshwater Action Plan requirements.	Support	Gives effect to NPSFM.	Not stated
S222.125	12 Schedules	A Freshwater Action Plans	Support	Gives effect to NPSFM.	Not stated
S222.126	12 Schedules	A1 Purpose	Support	Gives effect to NPSFM.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S222.127	12 Schedules	A2 Freshwater Action Plans required in Whaitua Te Whanganui-a-Tara.	Amend	Considers action plans which address river/stream habitat, natural form and function are needed to ensure degradation does not continue, council responsibilities under NPSFM Policies 7 and 9 are met, and NPSFM requirements to manage all 5 components of ecosystem health and natural form and function are met. Considers M39 requirements for the preparation of action plans for nationally threatened freshwater species which state habitat extent and condition should be carried through to Schedule 27. Noting habitat and natural form and character should form part of the action plans. Considers that action plans, with monitoring and interventions, are required to ensure further habitat within modified and degraded rivers and stream is not lost.	Include "Habitat and natural form and character" under "Attributes for which Freshwater Action Plan will be prepared" for all part FMUs which are rivers / streams. That is, Ōrongorongo, Te Awa Kairangi and Wainuiomata small forested and Te Awa Kairangi forested main stems Te Awa Kairangi lower main stem Te Awa Kairangi rural streams and rural main stems Te Awa Kairangi urban streams Waiwhetū Stream Wainuiomata urban streams Wainuiomata rural streams Parangarahu catchment streams and South-west coast rural streams Korokoro Stream Kaiwharawhara Stream Wellington urban Pouewe Takapū Taupō Te Rio o Porirua and Rangituhi Wai-O-Hata
S222.128	12 Schedules	A3 Freshwater Action Plans required in Te Awarua-o-Porirua Whaitua.	Amend	Considers action plans which address river/stream habitat, natural form and function are needed to ensure degradation does not continue, council responsibilities under NPSFM Policies 7 and 9 are met, and NPSFM requirements to manage all 5 components of ecosystem health and natural form and function are met. Considers M39 requirements for the preparation of action plans for nationally threatened freshwater species which state habitat extent and condition should be carried through to Schedule 27. Noting habitat and natural form and character should form part of the action plans. Considers that action plans, with monitoring and	Include "Habitat and natural form and character" under "Attributes for which Freshwater Action Plan will be prepared" for all part FMUs which are rivers / streams. That is, Ōrongorongo, Te Awa Kairangi and Wainuiomata small forested and Te Awa Kairangi forested mainstems Te Awa Kairangi lower mainstem Te Awa Kairangi rural streams and rural mainstems Te Awa Kairangi urban streams Waiwhetū Stream Wainuiomata urban streams Wainuiomata rural streams Parangarahu catchment streams and South-west coast rural streams Korokoro Stream Kaiwharawhara Stream

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				interventions, are required to ensure further habitat within modified and degraded rivers and stream is not lost.	Wellington urban Pouewe Takapū Taupō Te Rio o Porirua and Rangituhi Wai-O-Hata
S222.129	12 Schedules	B Freshwater Action Plan requirements.	Support	Gives effect to the NPSFM.	Not stated
S222.130	12 Schedules	B1. Principles.	Support	Gives effect to the NPSFM.	Not stated
S222.131	12 Schedules	B2. General Content.	Support	Gives effect to the NPSFM.	Not stated
S222.132	12 Schedules	B3 Necessary actions.	Amend	Considers additional wording is required to ensure natural form, character and habitat values are protected and maintained.	Insert the following wording **For the habitat and natural form and character attributes:** **(a) undertake a program to assess the state of habitat and natural form and character across the region, and** **(i) to monitor changes in habitat and natural form and character,** **(ii) to communicate changes through regular state of the environment reporting** **(b) review river management and flood protection plans to ensure habitat and natural form and character is maintained or improved through management actions** **(c) investigate options to strengthen consent conditions on activities which may affect habitat and natural form and character**
S222.133	12 Schedules	C. Freshwater Action Plans in	Support	Gives effect to the NPSFM.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Whaitua Te Whanganui-a-Tara			
S222.134	12 Schedules	D Freshwater Action Plans in Te Awarua-o-Porirua Whaitua	Support	Gives effect to the NPSFM.	Not stated
S222.135	12 Schedules	Schedule 28: Stormwater Contaminant Treatment.	Support	Gives effect to the NPSFM.	Not stated
S222.136	12 Schedules	Schedule 30: Financial Contributions.	Oppose	Considers methodology proposed in Schedule 30 is contrary to RMA s 107(1), the NZCPS, and the NPSFM as it does not follow the effects management hierarchy and may ultimately facilitate adverse effects on aquatic species, the further deterioration of water quality and ecosystem health.	Delete Schedule 30.
S222.137	12 Schedules	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Support	Gives effect to the NPSFM.	Not stated
S222.138	12 Schedules	A Purposes of the Erosion	Support	Gives effect to the NPSFM.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and Sediment Management Plan			
S222.139	12 Schedules	B Management objectives	Support	Gives effect to the NPSFM.	Not stated
S222.140	12 Schedules	C Requirements of the Erosion and Sediment Management Plan	Support	Gives effect to the NPSFM.	Not stated
S222.141	12 Schedules	C1 Contents of the Erosion and Sediment Management Plan	Support	Gives effect to the NPSFM.	Not stated
S222.142	12 Schedules	D Amendment of Erosion and Sediment Management Plan	Oppose	Considers GWRC should have jurisdiction to approve changes to management plans to ensure they still meet requirements to adequately manage sediment risk.	Not stated
S222.143	12 Schedules	Schedule 34: Plantation Forestry Erosion and	Support	Gives effect to NPSFM.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Sediment Management Plan.			
S222.144	12 Schedules	D Amendment of Erosion and Sediment Management Plan	Oppose	Considers GWRC should have jurisdiction to approve changes to management plans to ensure they still meet requirements to adequately manage sediment risk.	Not stated
S222.145	12 Schedules	Schedule 35: Small farm registration.	Amend	Considers the provision of fertiliser information to be critical in ensuring council are aware of pressures on a catchment and can set appropriate limits on resource use. This will also complement the reporting of stocking rates.	Include a requirement to report nitrogen fertiliser use.
S222.146	12 Schedules	F Small stream riparian programme.	Amend	Considers setbacks are required to ensure waterbodies are protected from contaminants and to ensure flood flows do not wash away fencing.	Amend to outline setback distance as a requirement, and to require revegetation of margins (with council support).

S178 Eugene Doyle

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S178.001	General comments	General comments - overall	Support	Supports PC1	Not stated
S178.002	General comments	General comments - overall	Support	Supports PC1 but to be successful the Plan needs to be integrated with functions and initiatives of other statutory authorities and effective community engagement	Not stated
S178.003	General comments	General comments - overall	Support	Supports the submissions of Neil Deans and Lynn Cadenhead in full	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S178.004	General comments	General comments - consultation	Not Stated	Seeks structures and processes that support greater oversight of work undertaken by Councils and key agencies. Also seeks structures and processes that provide for community participation at all levels. References the global reference group set up as part of WWLs global stormwater consents as a good example of a process to promote community participation that GWRC should follow.	Not stated
S178.005	General comments	General comments - consultationn	Not Stated	Recommends GWRC investment in a number of areas to ensure meaningful and effective community engagement. The areas include; digital platforms and other mechanisms for data sharing, increased funding for community/catchment monitoring programmes, financially supporting catchment communities and sufficient consultation on major resource consent approvals. Major resource consents should require data sharing in a form that the community can understand and that community panels be set up to participate in the monitoring of the effects of the activities	Not stated
S178.006	General comments	General comments - overall	Not Stated	Supports ongoing collaboration work with local communities and other groups	Not stated

S039 Fenaughty Partnership - Riu Huna Farm

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S39.001	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Oppose	Concerned about animal welfare if livestock cannot access streams for drinking water. Refer to comments against Policy WH.P26.	Delete provision.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S39.002	General comments	General comments - overall	Not Stated	Suggests GWRC take an approach of partnership and consulting with the community to achieve water quality outcomes. Concerned GWRC's community engagement for PC1 was lacking, with a GWRC presentation organised less than three weeks before submissions closed. Questions why affected parties did not have direct mail contact from GWRC regarding PC1 and why there was no formal agreement from the community board. Concerned PC1 information on GWRC website was not easily accessible and in relevant form. Considers GWRC 90-minute workshop was insufficient to provide information required for community to make informed decisions. Considers the timing of the consultation was unworkable as it was several weeks before Christmas and during a very busy farming season.	Not stated.
S39.003	General comments	General comments - consultation	Not Stated	Objects the lack of direct consultation with landowners and the community board and the short time frame for submissions.	Not stated.
S39.004	General comments	General comments - freshwater	Not Stated	Concerned the focus on sediment and erosion is based on data from a single monitoring station and the use of broad-brush modelling to identify potential erosion sources. Concerned the monitoring data used to determine the levels and sources of e-coli across the multiple catchments is based on extrapolation from data from one monitoring site Considers there needs to be more fine scale and regular water quality studies and potentially monitoring at the scale of each farm.	Not stated.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S39.005	General comments	General comments - current legislation	Not Stated	Considers the transition time should be determined by the implementation of the new freshwater regulations by central government. Concerned GWRC is acting prematurely and duplicating the process, adding costs for landowners and GWRC as well as reducing the available time to understand the problems that are trying to be solved. Considers plan change is a blunt instrument attempting to compensate for the lack of 'actual' local water quality information by proposing broad rules across multiple catchments rather than targeting usable and effective interventions for the best outcomes. Concerned wide-ranging proposed regulatory implications will create additional financial and time costs on community and there is a strong risk of not achieving the outcomes efficiently or effectively. Concerned under PC1 proposal, many people will be non-compliant within a short timeframe and face prosecution. Considers the proposed time to transition between current land use and implementing the proposed changes is unrealistically short and does not account for significant financial implications and requires potentially unneeded changes in our farm system and in land use. Considers solutions are best achieved on-farm by individual properties rather than through a wider approach based on the current whaitua or "Freshwater Management Unit". Considers many of small streams cross property boundaries and therefore must be implemented and monitored at an appropriate scale. Concerned of potential for perverse outcomes as these measures impose more cost and reduce the ability of farmers to operate economically.	Not stated.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S39.006	General comments	General comments - overall	Not Stated	Considers the perceived problems are not clearly articulated or supported and that solutions are best achieved by bespoke on-farm and by individual property solutions Concerned that small streams cross multiple property boundaries, suggesting that a better approach for implementing and monitoring is required.	Not stated.
S39.007	General comments	General comments - overall	Not Stated	Concerned of required financial and time costs for implementing the proposed changes and the significant impact on the viability of their enterprise. Concerned many people will be non-compliant with the proposed changes in a short timeframe and will therefore face prosecution. Concerned the proposed time to transition between current land use and implementing the proposed changes is unrealistic and does not account for significant financial implications, required changes in the farm systems and potential changes in land use. Considers PC1 measures assume worst-case scenario in water quality and do not account for any historical improvements carried out. Considers cost of implementing proposed changes will significantly affect farming enterprise, assuming requirement of farm plan and 'expert' verification will be high financially and in time allocated. Concerned PCI does not allow flexibility to prioritise or progressively stage work over time.	Not stated.
S39.008	General comments	General comments - current legislation	Not Stated	Delete as referenced in SP4.	Not stated.
S39.009	General comments	General comments - water quality	Not Stated	Concerned there has been insufficient information provided to identify problems or problem locations with water quality which impacts the ability to effectively target any remediation or work to improve this.	Not stated.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		improvements		Notes personal changes made to reduce sedimentation and potential deposition of biological pollution in small streams. Concerned the wider sources of contaminants (both by activity and by location) across Mākara and Ohariu is highly speculative as there is only one water quality monitoring site Considers there was little acknowledgement of the majoring flood events, remedial and construction programme carried out in Takarau George and house under construction that have consequent potential for erosion and increased sedimentation.	
S39.010	General comments	General comments - maps	Not Stated	Questions the accuracy of mapping for PC1 mapping which does not correspond to submitters experience. Concerned with accuracy of soil type analysis, and suggests modelling is not fit for purpose.	Not stated.
S39.011	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Support	Would like compensation added to financial support available if large-scale land retirement progresses.	Prioritise financial options prior to implementing new rules.
S39.012	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Support	Lack of data has led to assumptions and modelling which are not fit for purpose which makes it difficult to understand water quality and work out what solutions are needed. Considers wider contaminant sources across Makara and Ohariu are speculative and there is little acknowledgement of flooding and associated construction and remedial works along Takarau Gorge or the increasing number of houses being	Increase GWRC support for additional water quality monitoring in Mākara and Ohariu, including community-led monitoring.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				built and the potential for erosion and increases in sedimentation from these activities.	
S39.013	8 Whaitua Te Whanganui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Amend	Concern that the source of high e-coli levels in Makara Stream is unknown and that sources need to be understood in order for them to be addressed. Notes some parts of the catchment and stream outside of the catchment will not have an e-coli issue.	Add:**Identification of sources of e-coli specific to individual catchments.**
S39.014	8 Whaitua Te Whanganui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Amend	Feels this leads to inconsistency across WH.P22 and WH.P23. Thinks work to reduce e-coli levels should be targeted where e-coli is shown to be an issue and that there is no sufficient monitoring data to determine levels and sources of e-coli across multiple catchments. Concerned with the reliance of one monitoring site across the Makara and Ohariu catchments given differences in catchments/sub-catchments and would like to see local water quality studies and option for landowner farm-scale monitoring.	Add:**Incorporate e-coli reduction in catchment context and farm plans, based on monitored data.**
S39.015	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high	Amend	Concerned about costs and timeframes for revegetation, noting that removal of vegetation occurred over generations yet revegetation is required within short timeframe. Cites own experience with trials and concern fencing and retirement of land will be only tools available given challenges with revegetation projects in this area due to conditions (high winds). Considers about the accuracy of the modelled scenarios and that it might not include accurate	a.) Identify sediment sources by farm-scale assessment of sediment sources rather than erosion-risk mapping in PC1. Refocus on identifying "sediment sources" rather than erosion risk land/pasture. b.)Refocus from "erosion risk" to "sediment management. c). Remove revegetation and instead rely on bespoke actions and timeframes identified through farm-scale assessment, including via the audited Freshwater Farm Plans.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		risk of erosion.		analysis of soil types, and considers the modelling is coarse and not fit for purpose in Mākara/Ohariu. Concerned this policy includes generic assumptions on the source of sediment because it focuses on hill country erosion as a source and not streambank erosion in high flow events. Supports revegetation in vulnerable areas to reduce flood flows but is concerned that areas forced into retirement will be larger than the red areas mapped due to the need to aggregate areas and locate sensible fencelines. Suggests GWRC should allow for a more accurate assessment of risk by using individual farm assessments to assess sediment sources.	
S39.016	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	Considers sediment sources are broader than erosion on hillsides. Considers this helps to acknowledge other existing sediment management techniques.	Refocus from "erosion risk" to "sediment management".
S39.017	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment	Oppose	Concerned about the costs and timeframes for revegetation and the requirement to retire land. Considers the removal of vegetation occurred over generations yet revegetation is now required within short timeframes. Notes woody vegetation" will likely need to be	Remove this blanket approach and instead rely on the bespoke actions and timeframes that will be indentified through farm-scale assessment, including via the audited Freshwater Farm Plans.

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		discharges from farming activities on land with high risk of erosion.		natural reversion since using poplars and willows (alongside grazing) is unlikely to be successful on these steepest areas given the high-wind nature of our landscape Therefore fencing and retirement will be the only tool available. Considers the areas has unique challenges due to high winds and native planting will not be available on this scale. Concerned the provisions' requirement to maintain woody vegetation is unviable due to large-scale land retirement and reduced farm income because of the reduction in productive land and high fencing costs. Concerned of revegetation projects alongside Meridian's wind farms because afforestation needs to be designed to not impede wind flow.	
S39.018	8 Whaitua Te Whanganui-a-Tara	Policy WH.P26: Managing livestock access to small rivers.	Amend	Policy needs to be consistent with associated rule regarding reduced access not restricted access. Supports revegetating streams but notes costs and practicalities of fencing some areas. Wants to see farm scale analysis rather than blanket restrictions. Concerned about animal welfare if livestock cannot access streams for drinking water.	Replace "restrict" with "reduce". Amend policy wording to match heading about river size.
S39.019	8 Whaitua Te Whanganui-a-Tara	Policy WH.P27: Promoting stream shading.	Support	Concerned about doubling up on farm plan requirements when existing processes already in place under national regulation. Supports riparian planting for shade. Notes local community has began planting which helps streambank stabilisation.	Ensure details of this rule are consistent with the content and timing for Freshwater Farm Plans.
S39.020	8 Whaitua Te	Rule WH.R27: Farming	Amend	Concerned of doubling up on farm plan work due to the existing process under the national regulation.	Ensure that the details of this rule are consistent with the content and timing for Freshwater Farm Plans

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	Whanganui-a-Tara	activities on 20 hectares or more of land - permitted activity.			
S39.022	8 Whaitua Te Whanganui-a-Tara	Rule WH.R29: Livestock access to a small river - discretionary activity.	Oppose	Concerned about animal welfare if livestock cannot access streams for drinking water. Refer to comments against Policy WH.P26.	Delete provision.

S207 Firth Industries Limited

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S207.001	General comments	General comments - definitions	Amend	Concern with no definition for 'aquatic offset'. NRP defines 'biodiversity offset' and also defines 'offset'. Without an 'aquatic offset' definition, there is a risk the 'biodiversity offset' definition is inappropriately applied when considering 'offsetting' for an activity with more than minor effects on fresh water. Omitting the definition is inconsistent with the NPSFM (which has a definition). Understand that consequential amendments may be required to objectives, policies, and rules to reference this term.	Insert new definition of "aquatic offset" as follows:**Aquatic offset** **Has the same meaning as in the National Policy Statement for Freshwater Management (as set out below):** **means a measurable conservation outcome resulting from actions that are intended to:** **(a) redress any more than minor residual adverse effects on a wetland or river after all appropriate avoidance, minimisation, and remediation, measures have been sequentially applied; and** **(b) achieve no net loss, and preferably a net gain, in the extent and values of the wetland or river, where:** **(i) no net loss means that the measurable positive effects of actions match any loss of extent or values**

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					over space and time, taking into account the type and location of the wetland or river; and **(ii) net gain means that the measurable positive effects of actions exceed the point of no net loss**
S207.002	General comments	General comments - definitions	Amend	Concern with no definition for 'aquatic compensation'. NRP defines 'biodiversity compensation'. Without an 'aquatic compensation' definition, there is a risk the 'biodiversity compensation' definition is inappropriately applied when considering offsetting for an activity with more than minor effects on fresh water. Omitting the definition is inconsistent with the NPSFM (which has a definition). Understand that consequential amendments may be required to objectives, policies, and rules to reference this term.	Insert new definition of "aquatic compensation" as follows: **Aquatic compensation** **Has the same meaning as in the National Policy Statement for Freshwater Management (as set out below):** **means a conservation outcome resulting from actions that are intended to compensate for any more than minor residual adverse effects on a wetland or river after all appropriate avoidance, minimisation, remediation, and aquatic offset measures have been sequentially applied**
S207.003	General comments	General comments - stormwater management	Amend	Concerns some Firths operations are defined as "high risk industrial or trade premises". Recognise potential effects with hazardous substances must be managed, but seek amendments to "high risk industrial or trade premises" provisions to ensure they are clear, reasonable, practicable, and focussed on potential effects.	Requests a permitted/controlled activity pathway for new/redeveloped impervious surfaces at high risk industrial or trade premises, subject to appropriate conditions.
S207.004	General comments	General comments - unplanned greenfield development	Amend	Inappropriate for all development in "unplanned greenfield development areas" to be prohibited activities due to insufficient evidence to substantiate that 'all' development will have significant adverse effects. Although existing Firth sites are located within planned greenfield developed areas, concerns that future operations may be not be limited to existing sites. Considers that measures set out in the remaining stormwater discharge and impervious surface rules (as amended by the relief sought by Firth) are	Seek greater clarity on the scope of provisions for unplanned greenfield development, by incorporating a 'greenfield development' definition and a discretionary activity consenting pathway for development in "unplanned greenfield development areas".

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				incorporated into new development, development can occur when effects are suitably managed.	
S207.005	2 Interpretation	High risk industrial or trade premise	Amend	Opposes list of activates which 'could' be high risk industrial or trade premises. Includes various activities which could be managed so that hazardous substances are not exposed to rain (and therefore would not fall within the definition), including bullet point two "commercial cement, concrete or lime manufacturing or storage" which would capture several of Firth's sites. Concerns with the lack of evidence provided that the activities listed are, by default, high risk industrial or trade premises, and as drafted the list is unhelpful to plan readers because it implies that those activities are predetermined as meeting the definition. Considers 'contaminant' is too broad to include in definition as it could include any substance (as per RMA) not just stormwater. All industrial and trade premises could fall under this definition regardless of whether they involve storing, generating, or using hazardous substances. Scope of activities covered by definition is unclear and reference to 'contaminant' should be removed in order to focus on hazardous substance management.	Amend definition as follows: High risk industrial or trade premise An industrial or trade premise that stores, uses or generates ~~contaminants or~~ hazardous substances on-site that are exposed to rain and could become entrained in stormwater. ~~Activities that may occur at these premises could include:~~ ~~-boat construction and maintenance~~ ~~-commercial cement, concrete or lime manufacturing or storage~~ ~~-chemical manufacture, formulation or bulk storage, recovery, processing or recycling~~ ~~-fertiliser manufacture or bulk storage~~ ~~-storage of hazardous wastes including waste dumps or dam tailings associated with mining activities~~ ~~-petroleum or petrochemical industries including a petroleum depot, terminal blending plant or refinery, or facilities for recovery, reprocessing or recycling petroleum based materials,~~ ~~-scrap yards including automotive dismantling, wrecking or scrap metal yards~~ ~~-wood treatment or preservation, or bulk storage of treated timber~~ ~~-mineral extraction, refining and reprocessing, storage, and use~~ ~~-explosives and ordinances production, storage, and use~~ ~~-electronics including the commercial manufacturing, reconditioning, or recycling of computers, televisions, and other electronic devices~~ ~~-waste recycling, treatment, and disposal~~ ~~-engineering workshops with metal fabrication, or electroplaters~~ ~~-power stations, substations, or switchyards.~~
S207.006	2 Interpretation	Redevelopment	Amend	Oppose reference to 'minor' as it is subjective and uncertain	Amend the definition as follows: Redevelopment

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					For the purpose of assessment of a proposal involving the redevelopment of an existing urbanised property (i.e brownfield development, upgrades to existing roads etc.) in relation to stormwater effects, this includes is the replacement, reconstruction or addition (new) of impervious surfaces. Excludes: ~~minor~~ maintenance or repairs to roads, carparking areas, driveways and paving -installation, maintenance or repair of underground infrastructure or network utilities requiring trenching and resurfacing -activities that only involve the re-roofing of existing buildings.
S207.007	2 Interpretation	Unplanned greenfield development	Oppose	Scope of policies and rules for "unplanned greenfield development" is unclear as "greenfield development" is undefined. "Greenfield development" is used in proposed stormwater provisions, including a proposed prohibited activity through WH.R13 and P.R12. As per the Section 32 report, it is understood that "greenfield development" is focused on urban development but without a definition, all activities could fall under the term. Requests a definition that reflects the 'greenfield' definition in the Auckland Unitary Plan. Urban development should also be defined using the RPS definition which would support integration between the RPS and the NRP.	Amend the definition of "unplanned greenfield development" as follows: Unplanned greenfield development **Greenfield development** within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 which also require an underlying zone change (from rural/non-urban/open space to urban) though a District Plan change to enable the development. Note: Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023. Provide a definition of "greenfield development" as follows: **Greenfield development** **Means any urban development undertaken within a site or sites has not been previously used for urban land use.** As a consequential amendment, provide a definition of "urban development" to match the Regional Policy Statement definition as follows:

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					Urban development **Urban development is subdivision, use and development that is characterised by its planned reliance on reticulated services (such as water supply and drainage) by its generation of traffic, and would include activities (such as manufacturing), which are usually provided for in urban areas. It also typically has lots sizes of less than 3000 square metres.**
S207.008	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	Seek amendments to clause (a). Clause (a) 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 policy is necessary to ensure that it is 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.	Amend policy WH.P2 as follows: Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (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 (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry,

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					cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.
S207.009	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Amend	Seek removal of reference to contaminants in favour of focus on hazardous substances. It is impracticable to avoid contaminants being entrained in stormwater which is acknowledged in the section 32 report and policy WH.P15, which recognises there are acceptable levels of residual stormwater contaminants associated with development. Management of stormwater contaminants generally is provided for under policies WH.P10 and WH.P14, which will also apply to high risk industrial or trade premises. The policy can only regulate discharges where they enter "water" in accordance with section 15 of the RMA - refer to RMA water definition. The policy and rules imply "an existing or new stormwater network" is a fresh water receiving environment. Stormwater networks are piped and water within a stormwater network is not considered 'water' or subject to Regional Council's jurisdiction. The rule may apply to stormwater discharges to a surface waterbody from a stormwater network, but cannot manage effects at the point of discharge into the network. Therefore the reference to "via an existing local authority stormwater network" must be removed from the policy. If reference to the stormwater network is to be retained, this must be clarified as being "from" the stormwater network (rather than "via") to ensure that the policy and rules are not ultra vires.	Amend policy WH.P11 as follows: Policy WH.P11: Discharges of ~~contaminants~~ **hazardous substances** in stormwater from high risk industrial or trade premises The discharge of stormwater to water, ~~including discharges via the stormwater network,~~ from a high risk industrial or trade premise shall be managed by: (a) having procedures and equipment in place to contain any spillage of hazardous substances for storage or removal, and (b) avoiding ~~contaminants or~~ hazardous substances being entrained in stormwater and discharged to a surface water body or coastal water, including via the stormwater network, or where avoidance is not practicable, implementing good management practice to avoid or minimise adverse effects on the environment, including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and (c) installing an interceptor where there is a risk of petroleum hydrocarbons entering into the stormwater network, a surface water body or coastal water, and (d) avoiding or mitigating adverse effects of stormwater discharges on groundwater quality.
S207.010	8 Whaitua Te	Policy WH.P14: Stormwate	Amend	Seek amendments to policy in line with submission on "unplanned greenfield development" definition - defining "greenfield development"	Amend policy WH.P14 as follows: Policy WH.P14: Stormwater discharges from new and

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	Whanganui-a-Tara	r discharges from new and redeveloped impervious surfaces.			redeveloped impervious surfaces The adverse effects of stormwater discharges from new **greenfield development** shall be minimised, and adverse effects of stormwater discharges from existing urban areas reduced to the extent practicable, upon redevelopment, through implementing: (a) an on-site stormwater treatment system or an off-site communal stormwater treatment system that is designed to: (i) receive at least 85% of the mean annual runoff volume stormwater generated from new and redeveloped impervious surfaces of the property, and (ii) achieve copper and zinc load reductions factors equivalent to that of a raingarden/bioretention device, and (b) where stormwater discharges will enter a river, hydrological controls either on-site, or off-site via a communal stormwater treatment system.
S207.011	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Amend	The financial contribution requirement is inconsistent with NPS-FM and limits ability to implement the effects management hierarchy. Aquatic offsetting or aquatic compensation are required where effects are more than minor. Effects are expected and appropriate where effects are no more than minor. Clause implies financial contributions are only form of offsetting provided. Appendix 6 of the NPS-FM sets out principles that are to be applied when identifying an appropriate aquatic offset and it would be contrary to the NPS-FM to not allow for consideration against those principles. Seeks the policy does not frustrate the ability for other forms of aquatic offsetting or aquatic compensation to be undertaken. The policy can only regulate discharges where they enter "water" in accordance with section 15 of the RMA. The policy and rules imply "an existing or new stormwater network" is a fresh water receiving	Amend policy WH.P15 as follows: Policy WH.P15: Stormwater contaminant offsetting **or compensation** for new greenfield development ~~The~~ **Where there are more than minor residual** adverse effects of ~~residual~~ (post-treatment) stormwater contaminants from new **greenfield development,** roads (not already captured as part of a **greenfield development)** and state highways where the discharge will enter a surface water body or coastal water, including ~~via~~ **from** an existing or new stormwater network, **those effects must be managed by way of an aquatic offset or aquatic compensation, including through the following:** (a) ~~are to be~~ **provide an aquatic** offset by way of a financial contribution in accordance with Schedule 30 (financial contribution), or **(b) provide an aquatic offset in accordance with the principles for aquatic offsetting in Appendix 6 of the NPS-FM, and** **(c) where more than minor residual adverse effects**

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				environment. Stormwater networks are piped and water within a stormwater network is not considered 'water' or subject to Regional Council's jurisdiction. Therefore the reference to "via an existing local authority stormwater network" must be removed from the policy. If reference to the stormwater network is to be retained, this must be clarified as being "from" the stormwater network (rather than "via") to ensure that the policy and rules are not ultra vires. Amendments also account for defined term of "greenfield development" as per submission on the definition of "unplanned greenfield development".	**cannot be offset, aquatic compensation must be provided in accordance with the principles for aquatic compensation in Appendix 7 of the NPS-FM.**
S207.012	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Oppose	Oppose policy entirely. Lack of evidence in Section 32 report to justify direction and suggest all new stormwater discharges from unplanned greenfield development will cause significant effects. Inappropriately targets land use without considering if land use will have significant adverse effects.	Delete policy.
S207.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R1: Point source discharges of specific contaminants - prohibited activity.	Amend	The rule can only regulate discharges where they enter "water" in accordance with section 15 of the RMA. Implies "an existing or new stormwater network" is a fresh water receiving environment. Stormwater networks are piped and water within a stormwater network is not considered 'water' or subject to Regional Council's jurisdiction. The rule may apply to stormwater discharges to a surface waterbody from a stormwater network, but cannot manage effects at the point of discharge into the network. Therefore the reference to "via an existing local authority stormwater network" must be removed from the policy. If reference to the stormwater network is to be retained, this must be	Amend rule WH.R1 as follows: Rule WH.R1: Point source discharges of specific contaminants - prohibited activity The point source discharge of: (a) chemical cleaning products including vehicle cleaning products, detergents, bleach and disinfectant, or (b) paint and other substances used for the purpose of protecting surfaces (including stain and paint wash), or (c) solvents including paint stripper, or (d) liquid fuels, including diesel, petrol, oil, grease, except where these have been treated by an interceptor system to

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				clarified as being "from" the stormwater network (rather than "via") to ensure that the rule is not ultra vires.	collect hazardous contaminants and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons, or (e) radiator coolant, or (f) cooking oil, or (g) cement wash, cement slurry and concrete cutting waste, or (h) drill cooling water into water or onto or into land, including ~~via~~ a stormwater network, where it may enter a surface water body or coastal water is a prohibited activity.
S207.014	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Amend	Consider there will be no difference in effects associated with stormwater discharge from existing or new high risk industrial or trade premises and both should be provided for. Condition (d) should be amended to remove reference to 'contaminants' and focus on hazardous substances as 'contaminants' is too broad and are managed under the remainder of the conditions. The rule can only regulate discharges where they enter "water" in accordance with section 15 of the RMA. Rule implies "an existing or new stormwater network" is a fresh water receiving environment. Stormwater networks are piped and water within a stormwater network is not considered 'water' or subject to Regional Council's jurisdiction. The rule may apply to stormwater discharges to a surface waterbody from a stormwater network, but cannot manage effects at the point of discharge into the network. Therefore the reference to "via an existing local authority stormwater network" must be removed from the rule. If reference to the stormwater network is to be retained, this must be clarified as being "from" the stormwater network (rather than "via") to ensure that the rule is not ultra vires.	Amend rule WH.R4 as follows: Rule WH.R4: Stormwater from a~~n existing~~ high risk industrial or trade premise - permitted activity The discharge of stormwater from a~~n existing~~ high risk industrial or trade premise, that is not a port or airport, into water, or onto or into land where it may enter water, ~~including via an existing local authority stormwater network,~~ is a permitted activity, provided the following conditions are met: (a) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (b) the discharge does not contain wastewater, and (c) if the discharge is to land where it may enter groundwater, (i) the discharge cannot cause or exacerbate the flooding of any other property, and (ii) the discharge is not located within 20m of a bore used for water abstraction for potable supply or stock water, and (d) any ~~contaminants stored or used on site, or~~ hazardous substances **stored or used on site,** cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or (i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or

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				The note at the end of the rule should be deleted as part of giving effect to the relief sought by submitter in relation to the rules for new or redeveloped impervious surfaces for high risk industrial or trade premises.	(ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons, and (e) if the discharge is into a surface water body, coastal water or via an existing local authority stormwater network, the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and where the discharge is not via from an existing local authority stormwater network the discharge shall also not: (f) cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (g) give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life.~~Note For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to WH.R11.~~

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S207.015	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	New or redeveloped impervious surfaces for high risk industrial or trade premises should be provided for in this rule. This ensures high risk industrial and trade premises are not disincentivised from reconditioning or replacing impervious surfaces. Effects associated with hazardous substances at high-risk industrial or trade premises can be managed through solutions such as containment or interception and conditions under (d) of rule WH.R4 are appropriate for this purpose. The fixed baseline in condition (a) would be unworkable for redevelopment, as it could result in future redevelopment of the same impervious surface becoming a controlled or discretionary activity by default, even where the surface is less than 1,000m2. A 12-month time period, similar to that used for earthworks, would be more appropriate on the basis that it provides greater certainty and enforceability. The rule can only regulate discharges where they enter "water" in accordance with section 15 of the RMA. The rule implies "an existing or new stormwater network" is a fresh water receiving environment. Stormwater networks are piped and water within a stormwater network is not considered 'water' or subject to Regional Council's jurisdiction. Therefore the reference to "via an existing local authority stormwater network" must be removed. If reference to the stormwater network is to be retained, this must be clarified as being "from" the stormwater network (rather than "via") to ensure that the rule is not ultra vires. Inappropriate to require hydrological control for redevelopment of existing impervious surfaces under condition (c), on the basis that redevelopment of existing surfaces would not have any adverse	Amend rule WH.R5 as follows: Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including ~~through~~ **from** an existing or new local authority stormwater network, that is not ~~a high risk industrial or trade premise or~~ unplanned greenfield development, is a permitted activity, provided the following conditions are met: (a) the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m2 ~~(baseline property existing impervious area as at 30 October 2023)~~ **per property in any consecutive 12-month period** and (b) all new building materials associated with the development shall not include exposed zinc (including galvanised steel) or copper roof, cladding and spouting materials, and (c) the proposal provides hydrological control measures (for example rain tanks) onsite or offsite, where discharges will enter a surface water body (including ~~via~~ **from** an existing local authority stormwater network): (i) for all ~~impervious areas~~ **impervious surfaces** associated with a greenfield development, or (ii) for all ~~redeveloped and~~ new ~~impervious areas~~ **impervious surfaces** ~~involving~~ greater than 30m2 ~~of impervious area of a~~ **associated with** redevelopment (of an existing urbanised property), and (d) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (e) the discharge does not contain wastewater, and (f) the concentration of total suspended solids in the

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				effects on the flow of stormwater, when compared to the existing environment. For clarity, references to "impervious areas", which is not defined, should be replaced with references to "impervious surfaces", which is defined.	discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and where the discharge is not ~~via~~ **from** an existing or new local authority stormwater network: (g) the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (h) the discharge shall not give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life., **and where the new or redeveloped impervious surface is for a high risk industrial or trade premise:** **(i) any hazardous substances stored or used on site cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or** **(i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or** **(ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15**

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					milligrams per litre of total petroleum hydrocarbons. Note Where a property connects to a local authority stormwater network, additional connection requirements and authorisations may be required by the network utility operator.~~For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to WH.R11.~~
S207.016	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Seek high risk industrial and trade premises are not disincentivised from reconditioning or replacing impervious surfaces on the basis that new or redeveloped impervious surfaces are a discretionary activity. Effects associated with hazardous substances at high-risk industrial or trade premises can be managed through solutions such as containment or interception and considers that the conditions are appropriate for this purpose. Seek rule is amended to apply to high risk industrial or trade premises. Condition (a) should be amended to replace the fixed baseline for new or redeveloped impervious surfaces with a time period. The rule can only regulate discharges where they enter "water" in accordance with section 15 of the RMA. The rule implies "an existing or new stormwater network" is a fresh water receiving environment. Stormwater networks are piped and water within a stormwater network is not considered 'water' or subject to Regional Council's jurisdiction. Therefore the reference to "via an existing local authority stormwater network" must be removed. If reference to the stormwater network is to be retained, this must be clarified as being "from" the stormwater network (rather than "via") to ensure that the rule is not ultra vires.	Amend rule WH.R6 as follows: Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity The use of land for the creation of new impervious surfaces for greenfield development and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including ~~through~~ **from** an existing local authority stormwater network, that is not ~~a high risk industrial or trade premise or~~ unplanned greenfield development, is a controlled activity, provided the following conditions are met: (a) the proposal involves the creation of new impervious surfaces of between 1,000m2 and 3,000m2 ~~(baseline property existing impervious area as at 30 October 2023)~~ **per property in any consecutive 12-month period** or, (b) the proposal involves the creation new impervious surfaces of less than 1,000m2, but is not permitted under the conditions of Rule WH.R5, and,~~(c) a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions), and~~ (d) where stormwater directly or indirectly (~~through~~ **from** an existing local authority stormwater network) discharges to a river, hydrological control is provided either: (i) on-site, or

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				Mandatory financial contributions are not consistent with NPS-FM for the purpose of aquatic offsetting, on the basis that the effects management hierarchy in the NPS-FM only requires offsetting in circumstances where effects are more than minor. Where residual adverse effects are more than minor, applicants should have the opportunity to propose aquatic offsetting or compensation in accordance with Appendix 6 or 7 of the NPS-FM. It is inappropriate to require financial contributions as a condition, and that instead, a matter of control should be used.	(ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has been sized to accommodate the proposed stormwater discharges, and (e) stormwater contaminant treatment is provided that captures 85% of the mean annual runoff and directs it to a stormwater treatment system that treats in accordance with Schedule 28 (contaminant treatment) and is provided either: (i) on-site, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater treatment system that has capacity to treat contaminant loads from the site.,**and where the new impervious surface is for a high risk industrial or trade premise:** **(f) any hazardous substances stored or used on site cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or** **(i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or** **(ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons.** Matters of control 1. The design and layout of the on-site stormwater treatment system, including the ongoing operational and management measures necessary to ensure that stormwater quality will meet the requirements of condition (e) of this rule 2. The adequacy of hydrological control measures either on-site or off- site, where stormwater will enter a river 3. Where an off-site (or a combination of on-site and off-site) stormwater treatment system is utilised, whether this has capacity, availability (timing) and appropriate authorisations to connect into 4. The long-term operational, maintenance and ownership requirements of the stormwater treatment system

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					5. Whether sufficient use of water sensitive urban design measures have been applied to the site design and layout 6. ~~A financial contribution as required by Schedule 30 (financial contributions)~~ **Any aquatic offsetting or aquatic compensation proposed in accordance with policy WH.P15** **7. For high risk industrial or trade premises, the adequacy of any proposed containment system, interceptor system, or other proposed methods for the management of hazardous substances** 8. Condition of consent to demonstrate and/or monitor compliance with conditions (d), ~~and~~ (e), **and (f)** of this rule Notification In respect of Rule WH.R6, applications are precluded from limited and public notification (unless special circumstances exist).~~Note~~ ~~For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to WH.R11.~~
S207.017	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Amend	Seek high risk industrial and trade premises are not disincentivised from reconditioning or replacing impervious surfaces on the basis that new or redeveloped impervious surfaces are a discretionary activity. Effects associated with hazardous substances at high-risk industrial or trade premises can be managed through solutions such as containment or interception and considers that the conditions are appropriate for this purpose. Seek rule is amended to apply to high risk industrial or trade premises. Condition (a) should be amended to replace the fixed baseline for new or redeveloped impervious surfaces with a time period. The rule can only regulate discharges where they enter "water" in accordance with section 15 of the	Amend rule WH.R7 as follows: Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity The use of land for the creation of new and/or redevelopment of impervious surfaces of an existing urbanised property and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including ~~through~~ **from** an existing local authority stormwater network, ~~that is not a high risk industrial or trade premise,~~ is a controlled activity, provided the following conditions are met: (a) the proposal involves the creation of new, or redevelopment of impervious surfaces of between 1,000m2 and 3,000m2 ~~(baseline property existing impervious area as at 30 October 2023)~~ **per property in any consecutive 12-**

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				RMA. The rule implies "an existing or new stormwater network" is a fresh water receiving environment. Stormwater networks are piped and water within a stormwater network is not considered 'water' or subject to Regional Council's jurisdiction. Therefore the reference to "via an existing local authority stormwater network" must be removed. If reference to the stormwater network is to be retained, this must be clarified as being "from" the stormwater network (rather than "via") to ensure that the rule is not ultra vires.	**month period** or, (b) the proposal involves the creation of new, or redevelopment of impervious areas of less than 1,000m2 but is not permitted under the conditions of Rule WH.R5, and, (c) where stormwater directly or indirectly (~~through~~ **from** an existing local authority stormwater network) discharges to a river, hydrological control is provided either: (i) on-site, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has been sized to accommodate the proposed stormwater discharges, and (d) contaminant treatment of stormwater is provided either: (i) on-site through a stormwater treatment system, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater treatment system that has capacity to treat contaminant loads from the site **and where the new or redeveloped impervious surface is for a high risk industrial or trade premise:** **(e) any hazardous substances stored or used on site cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or** **(i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or (ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons.** Matters of control 1. Whether the design and layout of the on-site stormwater treatment system incorporates best practicable option measures to achieve (to the extent practicable) the capture of 85% of the mean annual stormwater runoff and treatment in accordance with Schedule 28 (contaminant treatment)

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					2. Whether the design and layout undertakes a best practicable option approach to the provision of hydrological control measures either onsite or offsite, where stormwater will enter a river 3. Where an off-site (or a combination of on-site and off-site) stormwater treatment system is utilised, whether this has capacity, availability (timing) and appropriate authorisations to connect into 4. The long-term operational, maintenance and ownership requirements of the stormwater treatment system 5. Whether there are topographical limitations influencing the provision of stormwater hydrological control and contaminant treatment 6. Whether sufficient use of water sensitive urban design methods have been applied to the site design and layout **7. For high risk industrial or trade premises, the adequacy of any proposed containment system, interceptor system, or other proposed methods for the management of hazardous substances** 8. Conditions to monitor compliance associated with any stormwater treatment system, ~~or~~ hydrological control measures, **or measures required under condition (e).** Notification In respect of Rule WH.R7, applications are precluded from limited and public notification (unless special circumstances exist).~~Note~~ ~~For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to Rule WH.R11.~~
S207.018	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious	Amend	The rule can only regulate discharges where they enter "water" in accordance with section 15 of the RMA. The rule implies "an existing or new stormwater network" is a fresh water receiving environment. Stormwater networks are piped and water within a stormwater network is not considered 'water' or subject to Regional Council's jurisdiction. Therefore the reference to "via an existing local	Amend rule WH.R11 as follows: Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised

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		surfaces - discretionary activity.		authority stormwater network" must be removed. If reference to the stormwater network is to be retained, this must be clarified as being "from" the stormwater network (rather than "via") to ensure that the rule is not ultra vires. Mandatory financial contributions are not consistent with NPS-FM for the purpose of aquatic offsetting, on the basis that the effects management hierarchy in the NPS-FM only requires offsetting in circumstances where effects are more than minor. Where residual adverse effects are more than minor, applicants should have the opportunity to propose aquatic offsetting or compensation in accordance with Appendix 6 or 7 of the NPS-FM. It is inappropriate to require financial contributions as a condition, and instead, a case by case consideration with reference to the requirements of policy WH.P15 is sought.	property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including ~~through~~ **from** an existing local authority stormwater network, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or Rule WH.R7, or prohibited under WH.R13 is a discretionary activity provided the following conditions ~~are~~ **is** met: (a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), ~~and.~~ ~~(b) if the proposal is for greenfield development a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions).~~
S207.019	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Amend	Inappropriate for all development in "unplanned greenfield development areas" to be prohibited activities due to insufficient evidence to substantiate that 'all' development will have significant adverse effects. If the measures set out in the remaining stormwater discharge and impervious surface rules (as amended by the relief sought by Firth) are incorporated into new development, it can be undertaken in a manner that appropriately avoids, remedies, or mitigates the adverse effects. A consenting pathway for development and a discretionary activity status is more appropriate than a prohibited activity. The approach promoted by the Council is unlikely to be workable, on the basis that the RMA does not provide for concurrent or coordinated consideration of separate changes to regional and district plans.	Amend rule WH.R13 as follows: Rule WH.R13: Stormwater from new unplanned greenfield development - ~~prohibited~~ **discretionary** activity The use of land and the associated discharge of stormwater from impervious surfaces from unplanned greenfield development direct into water, or onto or into land where it may enter a surface water body or coastal water, including ~~through~~ **from** an existing or proposed stormwater network, is a ~~prohibited~~ **discretionary** activity.~~Note~~ ~~Any unplanned greenfield development proposals will require a plan change to the relevant map (Map 86, 87, 88 or 89) to allow consideration of the suitability of the site and receiving catchment(s) for accommodating the water quality requirements of the National Policy Statement for Freshwater Management 2020, and the relevant freshwater and coastal water quality objectives of this Plan. Any plan change process should be considered concurrent with any~~

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				The rule can only regulate discharges where they enter "water" in accordance with section 15 of the RMA. The rule implies "an existing or new stormwater network" is a fresh water receiving environment. Stormwater networks are piped and water within a stormwater network is not considered 'water' or subject to Regional Council's jurisdiction. Therefore the reference to "via an existing local authority stormwater network" must be removed. If reference to the stormwater network is to be retained, this must be clarified as being "from" the stormwater network (rather than "via") to ensure that the rule is not ultra vires.	~~associated change to the relevant district plan, to support integrated planning and assessment.~~
S207.020	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	Clause (a) 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 policy is necessary to ensure that it is 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.	Amend policy as follows: Policy P.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (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 (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers, and (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and

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					(e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.
S207.021	9 Te Awarua-o-Porirua Whaitua	Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises.	Amend	Seek removal of reference to contaminants in favour of focus on hazardous substances. It is impracticable to avoid contaminants being entrained in stormwater which is acknowledged in the section 32 report and policy WH.P15, which recognises there are acceptable levels of residual stormwater contaminants associated with development. Management of stormwater contaminants generally is provided for under policies WH.P10 and WH.P14, which will also apply to high risk industrial or trade premises.	Amend policy as follows: Policy P.P11: Discharges of ~~a contaminant~~ hazardous substances in stormwater from high risk industrial or trade premises The discharge of stormwater to water from a high risk industrial or trade premise shall be managed by: (a) having procedures and equipment in place to contain any spillage of hazardous substances for storage or removal, and (b) avoiding ~~contaminants or~~ hazardous substances being entrained in stormwater and discharged to a surface water body or coastal water, including via the stormwater network, or where avoidance is not practicable, implementing good management practice to avoid or minimise adverse effects on the environment including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and (c) installing an interceptor where there is a risk of petroleum hydrocarbons entering into the stormwater network, a surface water body or coastal water, and (d) avoiding or mitigating adverse effects of stormwater discharges on groundwater quality.
S207.022	9 Te Awarua-	Policy P.P13: Stormwate	Amend	Seek amendments to policy inline with submission on "unplanned greenfield development" definition - defining "greenfield development"	Amend policy P.P13 as follows: Policy P.P13: Stormwater discharges from new and

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	o-Porirua Whaitua	r discharges from new and redeveloped impervious surfaces.			redeveloped impervious surfaces The adverse effects of stormwater discharges from new **greenfield development** shall be minimised, and adverse effects of stormwater discharges from existing urban areas reduced to the extent practicable upon redevelopment, through implementing: (a) an on-site stormwater treatment system or an off-site communal stormwater treatment system that is designed to: (i) receive at least 85% of the mean annual runoff volume stormwater generated from new and redeveloped impervious surfaces of the property, and (ii) achieve copper and zinc load reductions factors equivalent to that of a raingarden/bioretention device, and (b) where stormwater discharges will enter a river, hydrological controls either on-site, or off-site via a communal stormwater treatment system.
S207.023	9 Te Awarua-o-Porirua Whaitua	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Amend	The financial contribution requirement is inconsistent with NPS-FM and limits ability to implement the effects management hierarchy. Aquatic offsetting or aquatic compensation are required where effects are more than minor. Effects are expected and appropriate where effects are no more than minor. Clause implies financial contributions are only form of offsetting provided. Appendix 6 of the NPS-FM sets out principles that are to be applied when identifying an appropriate aquatic offset and it would be contrary to the NPS-FM to not allow for consideration against those principles. Seeks the policy does not frustrate the ability for other forms of aquatic offsetting or aquatic compensation to be undertaken. The policy can only regulate discharges where they enter "water" in accordance with section 15 of the RMA. The policy and rules imply "an existing or new stormwater network" is a fresh water receiving environment. Stormwater networks are piped and	Amend policy as follows: Policy P.P14: Stormwater contaminant offsetting **or compensation** for new greenfield development ~~The~~ **Where there are more than minor residual** adverse effects of ~~residual~~ (post-treatment) stormwater contaminants from new **greenfield development,** roads (not already captured as part of a **greenfield development)** and state highways where the discharge will enter a surface water body or coastal water, including ~~via~~ **from** an existing or new stormwater network, **those effects must be managed by way of an aquatic offset or aquatic compensation, including through the following:** (a) ~~are to be~~ **provide an aquatic** offset by way of a financial contribution in accordance with Schedule 30 (financial contribution), or **(b) provide an aquatic offset in accordance with the principles for aquatic offsetting in Appendix 6 of the NPS-FM, and** **(c) where more than minor residual adverse effects cannot be offset, aquatic compensation must be**

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				water within a stormwater network is not considered 'water' or subject to Regional Council's jurisdiction. Therefore the reference to "via an existing local authority stormwater network" must be removed from the policy. If reference to the stormwater network is to be retained, this must be clarified as being "from" the stormwater network (rather than "via") to ensure that the policy and rules are not ultra vires. Amendments also account for defined term of "greenfield development" as per submission on the definition of "unplanned greenfield development".	**provided in accordance with the principles for aquatic compensation in Appendix 7 of the NPS-FM.**
S207.024	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Oppose	Oppose policy entirely. Lack of evidence in Section 32 report to justify direction and suggest all new stormwater discharges from unplanned greenfield development will cause significant effects. Inappropriately targets land use without considering if land use will have significant adverse effects	Delete policy.
S207.025	9 Te Awarua-o-Porirua Whaitua	Rule P.R1: Point source discharges of specific contaminants - prohibited activity.	Amend	The rule can only regulate discharges where they enter "water" in accordance with section 15 of the RMA. Implies "an existing or new stormwater network" is a fresh water receiving environment. Stormwater networks are piped and water within a stormwater network is not considered 'water' or subject to Regional Council's jurisdiction. The rule may apply to stormwater discharges to a surface waterbody from a stormwater network, but cannot manage effects at the point of discharge into the network. Therefore the reference to "via an existing local authority stormwater network" must be removed from the rule. If reference to the stormwater network is to be retained, this must be clarified as being "from" the stormwater network	Amend rule P.R1 as follows: Rule P.R1: Point source discharges of specific contaminants - prohibited activity The point source discharge of: (a) chemical cleaning products including vehicle cleaning products, detergents, bleach and disinfectant, or (b) paint and other substances used for the purpose of protecting surfaces (including stain and paint wash), or (c) solvents including paint stripper, or (d) liquid fuels, including diesel, petrol, oil, grease, except where these have been treated by an interceptor system to collect hazardous contaminants and the treated discharge does not contain more than 15 milligrams per litre of total

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				(rather than "via") to ensure the rule is not ultra vires.	petroleum hydrocarbons, or (e) radiator coolant, or (f) cooking oil, or (g) cement wash, cement slurry and concrete cutting waste, or (h) drill cooling water into water or onto or into land, including ~~via~~ **from** a stormwater network, where it may enter a surface water body or coastal water is a prohibited activity.
S207.026	9 Te Awarua-o-Porirua Whaitua	Rule P.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Amend	Consider there will be no difference in effects associated with stormwater discharge from existing or new high risk industrial or trade premises and both should be provided for. Condition (d) should be amended to remove reference to 'contaminants' and focus on hazardous substances as 'contaminants' is too broad and are managed under the remainder of the conditions. The rule can only regulate discharges where they enter "water" in accordance with section 15 of the RMA. Rule implies "an existing or new stormwater network" is a fresh water receiving environment. Stormwater networks are piped and water within a stormwater network is not considered 'water' or subject to Regional Council's jurisdiction. The rule may apply to stormwater discharges to a surface waterbody from a stormwater network, but cannot manage effects at the point of discharge into the network. Therefore the reference to "via an existing local authority stormwater network" must be removed from the rule. If reference to the stormwater network is to be retained, this must be clarified as being "from" the stormwater network (rather than "via") to ensure that the rule is not ultra vires. The note at the end of the rule should be deleted as	Amend rule P.R4 as follows: Rule P.R4: Stormwater from a~~n existing~~ high risk industrial or trade premise - permitted activity The discharge of stormwater from a~~n existing~~ high risk industrial or trade premise, into water, or onto or into land where it may enter water, ~~including via an existing local authority stormwater network,~~ is a permitted activity, provided the following conditions are met: (a) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (b) the discharge does not contain wastewater, and (c) if the discharge is to land where it may enter groundwater, (i) the discharge cannot cause or exacerbate the flooding of any other property, and (ii) the discharge is not located within 20m of a bore used for water abstraction for potable supply or stock water, and (d) any ~~contaminants stored or used on site, or~~ hazardous substances **stored or used on site,** cannot be entrained in stormwater and discharged to a surface water body or coastal water, including via the stormwater network, or (i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or (ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the

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				part of giving effect to the relief sought by submitter in relation to the rules for new or redeveloped impervious surfaces for high risk industrial or trade premises..	stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons, and (e) if the discharge is into a surface water body, coastal water or via an existing local authority stormwater network, the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and where the discharge is not ~~via~~ **from** an existing local authority stormwater network the discharge shall also not: (f) cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (g) give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life.~~Note For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to P.R10.~~
S207.027	9 Te Awarua-	Rule P.R5: Stormwater from new	Amend	New or redeveloped impervious surfaces for high risk industrial or trade premises should be provided for in this rule. This ensures high risk industrial and	Amend rule P.R5 as follows: Rule P.R5: Stormwater from new and redeveloped

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	o-Porirua Whaitua	and redeveloped impervious surfaces - permitted activity.		trade premises are not disincentivised from reconditioning or replacing impervious surfaces. Effects associated with hazardous substances at high-risk industrial or trade premises can be managed through solutions such as containment or interception and conditions under (d) of rule WH.R4 are appropriate for this purpose. The fixed baseline in condition (a) would be unworkable for redevelopment, as it could result in future redevelopment of the same impervious surface becoming a controlled or discretionary activity by default, even where the surface is less than 1,000m2. A 12-month time period, similar to that used for earthworks, would be more appropriate on the basis that it provides greater certainty and enforceability. The rule can only regulate discharges where they enter "water" in accordance with section 15 of the RMA. The rule implies "an existing or new stormwater network" is a fresh water receiving environment. Stormwater networks are piped and water within a stormwater network is not considered 'water' or subject to Regional Council's jurisdiction. Therefore the reference to "via an existing local authority stormwater network" must be removed. If reference to the stormwater network is to be retained, this must be clarified as being "from" the stormwater network (rather than "via") to ensure that the rule is not ultra vires. Inappropriate to require hydrological control for redevelopment of existing impervious surfaces under condition (c), on the basis that redevelopment of existing surfaces would not have any adverse effects on the flow of stormwater, when compared to the existing environment.	impervious surfaces - permitted activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including ~~through~~ **from** an existing or new local authority stormwater network, that is not ~~a high risk industrial or trade premise or~~ unplanned greenfield development, is a permitted activity, provided the following conditions are met: (a) the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m2 ~~(baseline property existing impervious area as at 30 October 2023)~~ **per property in any consecutive 12-month period** and (b) all new building materials associated with the development shall not include exposed zinc (including galvanised steel) or copper roof, cladding and spouting materials and (c) the proposal provides hydrological control measures (for example rain tanks) onsite or offsite, where discharges will enter a surface water body (including ~~via~~ **from** an existing local authority stormwater network): (i) for all ~~impervious areas~~ **impervious surfaces** associated with a greenfield development, or (ii) for all ~~redeveloped and~~ new ~~impervious areas~~ **impervious surfaces** ~~involving~~ greater than 30m2 ~~of impervious area of a~~ **associated with** redevelopment (of an existing urbanised property), and (d) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (e) the discharge does not contain wastewater, and (f) the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies),

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				For clarity, references to "impervious areas", which is not defined, should be replaced with references to "impervious surfaces", which is defined.	Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and where the discharge is not ~~via~~ **from** an existing or new local authority stormwater network: (g) the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (h) the discharge shall not give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life. **and where the new or redeveloped impervious surface is for a high risk industrial or trade premise:** **(i) any hazardous substances stored or used on site cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or** **(i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or** **(ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons.** Note Where a property connects to a local authority stormwater

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					network, additional connection requirements and authorisations may be required by the network utility operator. ~~For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to Rule P.R10.~~
S207.028	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Seek high risk industrial and trade premises are not disincentivised from reconditioning or replacing impervious surfaces on the basis that new or redeveloped impervious surfaces are a discretionary activity. Effects associated with hazardous substances at high-risk industrial or trade premises can be managed through solutions such as containment or interception and considers that the conditions are appropriate for this purpose. Seek rule is amended to apply to high risk industrial or trade premises. Condition (a) should be amended to replace the fixed baseline for new or redeveloped impervious surfaces with a time period. The rule can only regulate discharges where they enter "water" in accordance with section 15 of the RMA. The rule implies "an existing or new stormwater network" is a fresh water receiving environment. Stormwater networks are piped and water within a stormwater network is not considered 'water' or subject to Regional Council's jurisdiction. Therefore the reference to "via an existing local authority stormwater network" must be removed. If reference to the stormwater network is to be retained, this must be clarified as being "from" the stormwater network (rather than "via") to ensure that the rule is not ultra vires. Mandatory financial contributions are not consistent with NPS-FM for the purpose of aquatic offsetting,	Amend rule P.R6 as follows: Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity The use of land for the creation of new impervious surfaces for greenfield development and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including ~~through~~ **from** an existing local authority stormwater network, that is not ~~a high risk industrial or trade premise or~~ unplanned greenfield development, is a controlled activity, provided the following conditions are met: (a) the proposal involves the creation of new impervious surfaces of between 1,000m2 and 3,000m2 ~~(baseline property existing impervious area as at 30 October 2023)~~ **per property in any consecutive 12-month period** or, (b) the proposal involves the creation new impervious surfaces of less than 1,000m2, but is not permitted under the conditions of Rule P.R6, and,~~(c) a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions), and~~ (d) where stormwater directly or indirectly (~~through~~ **from** an existing local authority stormwater network) discharges to a river, hydrological control is provided either: (i) on-site, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				on the basis that the effects management hierarchy in the NPS-FM only requires offsetting in circumstances where effects are more than minor. Where residual adverse effects are more than minor, applicants should have the opportunity to propose aquatic offsetting or compensation in accordance with Appendix 6 or 7 of the NPS-FM. It is inappropriate to require financial contributions as a condition, and that instead, a matter of control should be used.	been sized to accommodate the proposed stormwater discharges, and (e) stormwater contaminant treatment is provided that captures 85% of the mean annual runoff and directs it to a stormwater treatment system that treats in accordance with Schedule 28 (contaminant treatment) and is provided either: (i) on-site, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater treatment system that has capacity to treat contaminant loads from the site., **and where the new impervious surface is for a high risk industrial or trade premise:** **(f) any hazardous substances stored or used on site cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or** **(i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or** **(ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons.** Matters of control 1. The design and layout of the on-site stormwater treatment system, including the ongoing operational and management measures necessary to ensure that stormwater quality will meet the requirements of condition (e) of this rule 2. The adequacy of hydrological control measures either on-site or off- site, where stormwater will enter a river 3. Where an off-site (or a combination of on-site and off-site) stormwater treatment system is utilised, whether this has capacity, availability (timing) and appropriate authorisations to connect into 4. The long-term operational, maintenance and ownership requirements of the stormwater treatment system 5. Whether sufficient use of water sensitive urban design measures have been applied to the site design and layout

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					6. ~~A financial contribution as required by Schedule 30 (financial contributions)~~ **Any aquatic offsetting or compensation proposed in accordance with policy P.P14** **7. For high risk industrial or trade premises, the adequacy of any proposed containment system, interceptor system, or other proposed methods for the management of hazardous substances** 8. Condition of consent to demonstrate and/or monitor compliance with conditions (d), ~~and~~ (e), **and (f)** of this rule Notification In respect of Rule P.R6, applications are precluded from limited and public notification (unless special circumstances exist).~~Note~~ ~~For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to Rule P.R10.~~
S207.029	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas-controlled activity.	Amend	Seek high risk industrial and trade premises are not disincentivised from reconditioning or replacing impervious surfaces on the basis that new or redeveloped impervious surfaces are a discretionary activity. Effects associated with hazardous substances at high-risk industrial or trade premises can be managed through solutions such as containment or interception and considers that the conditions are appropriate for this purpose. Seek rule is amended to apply to high risk industrial or trade premises. Condition (a) should be amended to replace the fixed baseline for new or redeveloped impervious surfaces with a time period. The rule can only regulate discharges where they enter "water" in accordance with section 15 of the RMA. The rule implies "an existing or new stormwater network" is a fresh water receiving	Amend rule P.R7 as follows: Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity The use of land for the creation of new and/or redevelopment of impervious surfaces of an existing urbanised property and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including ~~through~~ **from** an existing local authority stormwater network, ~~that is not a high risk industrial or trade premise,~~ is a controlled activity, provided the following conditions are met: (a) the proposal involves the creation of new, or redevelopment of impervious surfaces of between 1,000m2 and 3,000m2 ~~(baseline property existing impervious area as at 30 October 2023)~~ **per property in any consecutive 12-month period** or,

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				environment. Stormwater networks are piped and water within a stormwater network is not considered 'water' or subject to Regional Council's jurisdiction. Therefore the reference to "via an existing local authority stormwater network" must be removed. If reference to the stormwater network is to be retained, this must be clarified as being "from" the stormwater network (rather than "via") to ensure that the rule is not ultra vires.	(b) the proposal involves the creation of new, or redevelopment of impervious areas of less than 1,000m2 but is not permitted under the conditions of Rule P.R6, and, (c) where stormwater directly or indirectly (~~through~~ **from** an existing local authority stormwater network) discharges to a river, hydrological control is provided either: (i) on-site, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has been sized to accommodate the proposed stormwater discharges, and (d) contaminant treatment of stormwater is provided either: (i) on-site through a stormwater treatment system, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater treatment system that has capacity to treat contaminant loads from the site **and where the new or redeveloped impervious surface is for a high risk industrial or trade premise:** **(e) any hazardous substances stored or used on site cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or** **(i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or (ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons.** Matters of control 1. Whether the design and layout of the on-site stormwater treatment system incorporates best practicable option measures to achieve (to the extent practicable) the capture of 85% of the mean annual stormwater runoff and treatment in accordance with Schedule 28 (contaminant treatment) 2. Whether the design and layout undertakes a best practicable option approach to the provision of hydrological

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					control measures either on- site or off-site, where stormwater will enter a river 3. Where an off-site (or a combination of on-site and off-site) stormwater treatment system is utilised, whether this has capacity, availability (timing) and appropriate authorisations to connect into 4. The long-term operational, maintenance and ownership requirements of the stormwater treatment system 5. Whether there are topographical limitations influencing the provision of stormwater hydrological control and contaminant treatment 6. Whether sufficient use of water sensitive urban design methods have been applied to the site design and layout **7. For high risk industrial or trade premises, the adequacy of any proposed containment system, interceptor system, or other proposed methods for the management of hazardous substances** 8. Conditions to monitor compliance associated with any stormwater treatment system, or hydrological control measures, **or measures required under condition (e).** Notification In respect of Rule P.R~~(NEWRULE)~~ **7,** applications are precluded from limited and public notification (unless special circumstances exist).~~Note~~ ~~For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to refer to Rule P.R8.~~
S207.030	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-	Amend	The rule can only regulate discharges where they enter "water" in accordance with section 15 of the RMA. The rule implies "an existing or new stormwater network" is a fresh water receiving environment. Stormwater networks are piped and water within a stormwater network is not considered 'water' or subject to Regional Council's jurisdiction. Therefore the reference to "via an existing local authority stormwater network" must be removed. If reference to the stormwater network is to be	Amend rule P.R10 as follows: Rule P.R10: Stormwater from new and redeveloped impervious surfaces - discretionary activity The use of land for the creation of new or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discretionary activity.		retained, this must be clarified as being "from" the stormwater network (rather than "via") to ensure that the rule is not ultra vires. Mandatory financial contributions are not consistent with NPS-FM for the purpose of aquatic offsetting, on the basis that the effects management hierarchy in the NPS-FM only requires offsetting in circumstances where effects are more than minor. Where residual adverse effects are more than minor, applicants should have the opportunity to propose aquatic offsetting or compensation in accordance with Appendix 6 or 7 of the NPS-FM. It is inappropriate to require financial contributions as a condition, and instead, a case by case consideration with reference to the requirements of policy WH.P15 is sought.	body or coastal water, including ~~via~~ **from** an existing local authority stormwater network, that is not permitted by Rule P.R5, or a controlled activity under Rule P.R6 or Rule P.R7, or prohibited under P.R12 is a discretionary activity provided the following conditions ~~are~~ **is** met: (a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), ~~and.~~ ~~(b) if the proposal is for greenfield development, a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions).~~
S207.031	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Amend	Inappropriate for all development in "unplanned greenfield development areas" to be prohibited activities due to insufficient evidence to substantiate that 'all' development will have significant adverse effects. If the measures set out in the remaining stormwater discharge and impervious surface rules (as amended by the relief sought by Firth) are incorporated into new development, it can be undertaken in a manner that appropriately avoids, remedies, or mitigates the adverse effects. A consenting pathway for development and a discretionary activity status is more appropriate than a prohibited activity. The approach promoted by the Council is unlikely to be workable, on the basis that the RMA does not provide for concurrent or coordinated consideration of separate changes to regional and district plans. The rule can only regulate discharges where they enter "water" in accordance with section 15 of the	Amend rule P.R12 as follows: Rule P.R12: Stormwater discharges from new unplanned greenfield development - ~~prohibited~~ **discretionary** activity The use of land and the associated discharge of stormwater from impervious surfaces from unplanned greenfield development direct into water, or onto or into land where it may enter a surface water body or coastal water, including ~~through~~ **from** an existing or proposed stormwater network, is a ~~prohibited~~ **discretionary** activity.~~Note Any unplanned greenfield development proposals will require a plan change to the relevant map (Map 86, 87, 88 or 89) to allow consideration of the suitability of the site and receiving catchment(s) for accommodating the water quality requirements of the National Policy Statement for Freshwater Management 2020, and the relevant freshwater and coastal water quality objectives of this Plan. Any plan change process should be considered concurrent with any associated change to the relevant district plan, to support integrated planning and assessment.~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				RMA. The rule implies "an existing or new stormwater network" is a fresh water receiving environment. Stormwater networks are piped and water within a stormwater network is not considered 'water' or subject to Regional Council's jurisdiction. Therefore the reference to "via an existing local authority stormwater network" must be removed. If reference to the stormwater network is to be retained, this must be clarified as being "from" the stormwater network (rather than "via") to ensure that the rule is not ultra vires.	

S261 Forest & Bird

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S261.001	General comments	General comments - definitions	Not Stated	Considers amendments are required for some definitions which set out limits or define key terms inappropriately. Notes many definitions cross-reference to definitions in other legislation, and seeks that the text is set out instead for ease of use.	Amend definitions which cross-reference to other legislation to the actual text for those definitions.
S261.002	General comments	General comments - target attribute states	Not Stated	Considers Target Attribute State targets too high in some part FMUs and seeks they are lowered. Notes the numeric target for the Taupo part FMU appears to be above the modelled baseline and considers this impermissible as targets must be at or below the baseline. Considers Target Attribute States should be introduced for "habitat" and "natural form and character" which activities must seek to achieve, and which should be included as targets for Habitat Quality Index / Natural Character Index scores, and/or physical properties to achieve for the river, and that this would be consistent with Policy 30. Considers activities should then be required to undertake activities which maintains habitat quality in accordance with the target attribute states.	Include Target Attribute States for 'habitat' and 'natural form and character' and include as targets for Habitat Quality Index / Natural Character Index scores, and/or physical properties to achieve for the river.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S261.003	General comments	General comments - target attribute states	Not Stated	Notes the NPSM require target states to be set at intervals of no longer than 10 years, and therefore interim target states need to be set out in the plan, or a shorter timeframe is set of no later than 2033. Considers targets must reflect the state that achieves the long-term vision.	Provide interim timeframes for target attribute states
S261.004	General comments	General comments - water bodies	Not Stated	Considers it unclear the identified values for each FMU, and that they should be identified, with at least one environmental outcome for each value. Notes the environmental outcomes objectives appear to be combined, but it is not clear which outcome relates to which value.	Identify the values for each FMU and provide at least one environmental outcome for each value
S261.005	General comments	General comments - water bodies	Not Stated	Concerned the flow provision do not comply with the NPSFM. Considers environmental flows and levels need to be rules, as do take limits, to enable review of existing consents to bring them in line with new flows and limits. Notes the rules allow taking water below minimum flows, providing for overallocation and considers this contrary to the NPSM. Considers takes below minimum flows and in exceedance of allocation limits should be prohibited. Concerned with the s32 approach to provide flow/allocation provisions for Te Whanganui a Tara "in a later plan change", due to lack of clarity on when it will occur. Considers interim limits need to be set to ensure life supporting capacity requirements for indigenous species are safeguarded. Concerned that take limits/allocation limits may not achieve environmental outcomes.	Amend so environmental flows and levels, and take limits, are rules.
S261.006	General comments	General comments - water quality improvements	Not Stated	Seeks Te Mana o te Wai is effected in the plan, to protect ecosystem health, community health, and the health of people.	Give effect to Te Mana o te Wai throughout the plan
S261.007	General comments	General comments	Not Stated	Considers Schedule 27 A2 and A3 must address all Appendix 2B attributes for all part FMUs. Considers it important to include natural form and character	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		- water bodies		and habitat. Considers if target attribute states are already achieved, the action plan should set out how they will be maintained, which should be reflected in B1(6) and B2, which themselves should be amended to reflect actions to maintain. Considers the schedule should specify that action plans will set out how target attribute states will be achieved within the relevant timeframe, and should be reflected in A1 and B2(1)(b). Notes B3(1) is missing DIN, and that the actions should be broader and which relate to nitrate and DIN. Considers action plans need to integrate with action plans required under 3.25 to return rivers to natural hard bottom states.	
S261.008	General comments	General comments - overall	Not Stated	Notes the current provision for a "recognised nitrogen risk assessment tool" allows a tool to be used to fulfil the policies in the plan by a process outside Schedule 1, enabling council to approve any tool provided it is "quantitative" and assesses risk of nitrogen discharge. Questions the lawfulness of delegation, as no other criteria or processes are provided for approval. Considers it critical that tools account for biophysical factors and relate to the actual discharge or environmental effects of the discharge. Considers any "recognised nitrogen risk assessment tool" must be subject to wider public scrutiny before being included in the plan.	Consult on any recognised nitrogen risk assessment tool before including in the plan
S261.009	General comments	General comments - stormwater management	Not Stated	Considers financial contributions are more akin to environmental compensation than offsetting. Considers the proposed approach is to be done at an aggregated level, instead of by the consent holder at the project level. Notes the policies in PC1 only require minimisation prior to compensation, rather than NPSFM requirement for avoidance, then minimisation, then offsetting before considering compensation, and is therefore inconsistent with the NPSFM. Notes Schedule 30 suggests that s108 only allows financial contribution for the purpose of	References to offset and compensation must be consistent with the framework in the NPSM.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				offsetting, however considers financial contributions can be for any purposes specified in the plan. Considers references to offset and compensation must be consistent with the framework in the NPSM. Notes NCZPS will prevail in the coastal environment.	
S261.010	General comments	General comments - overall	Not Stated	Considers PC1 essentially provides for farming as a permitted activity provided there is a farm plan. Notes the requirements for farm plans may be confusing for plan users due to being spread across PC1 Schedule 36 and the existing NRP and suggests this could be improved. Notes additional regulation can be imposed beyond farm plans. Considers it critical to regulate land use to manage cumulative effects, noting existing challenges with contaminants in the Porirua whaitua. Considers Council should be able to decline resource consent for farming activity where it is not confident the effects will be appropriately managed by a farm plan, and that a stronger activity status is required. Considers permitted activity status is only appropriate if oversight is not needed on the content of farm plans, and when they can be written by farm advisers where there is certainty the adverse effects of farms will result in the desired environmental outcome. Concerned this may not be possible in the Porirua Whaitua.	Consider improvements for distribution of requirements for farm plans in PC1 provisions. Amend to provide a stronger activity for farming activities to allow Council to decline resource consent for farming activity where it is not confident the effects will be appropriately managed by a farm plan.
S261.011	General comments	General comments - water bodies	Not Stated	Considers farm plan 'critical source area' management and small stream stock exclusion provisions need to be strengthened as to protect ephemeral water courses.	Strengthen farm plan 'critical source area' management and small stream stock exclusion provisions to protect ephemeral water courses.
S261.012	2 Interpretation	Afforestation	Oppose	Seeks full text is referenced to assist plan users.	Include full text of definition. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.013	2 Interpretation	Annual stocking rate	Support	Supports giving effect to NPS-FM provisions.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S261.014	2 Interpretation	Earthworks	Not Stated	Seeks full text is referenced to assist plan users.	Include full text of definition of earthworks (from the NES). Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.015	2 Interpretation	Environmental outcomes	Amend	Considers additional objectives are required to meet NPSFM requirements. Seeks objectives WH.O6, WH.O7, WH.O8, P.O5 and P.O6 are included within the definition, which relate to groundwater levels and integrity and the compulsory value of contact recreation. Considers further objectives may be necessary.	Include reference to objectives WH.O6, WH.O7 and WH.O8 and P.O5 and P.O6, and any others required to meet NPSFM requirements. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.016	2 Interpretation	Harvesting	Amend	Seeks full text is referenced to assist plan users.	Include full text of definition. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.017	2 Interpretation	Intensive grazing	Amend	Seeks for the meaning set out in Regulation 4 of the Resource Management (Stock Exclusion) Regulations 2020 be set out in full for ease of use, consistent with PC1's treatment of the definition of "threatened species".	Amend as follows: Has the same meaning as set out in Regulation ~~3~~ **4** of the Resource Management (Stock Exclusion) Regulations 2020:**Meaning:** **(a) break feeding; or** **(b) grazing on annual forage crops; or** **(c) grazing on pasture that has been irrigated with water in the previous 12 months** Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.018	2 Interpretation	Nationally threatened freshwater species	Amend	Notes the NPSFM refers to "threatened species" rather than "threatened freshwater species", and that some species that rely on freshwater for part of their life cycle will not constitute "freshwater species".	Amend to **"nationally threatened species"** or **"threatened species"** Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.019	2 Interpretation	Nitrogen discharge risk	Oppose	Considers there must be consideration of biophysical factors influencing nitrogen loss, and the sensitivity of the receiving environment to that nitrogen loss.	Amend as follows: The quantitative assessment of nitrogen loss risk as determined using a recognised risk assessment tool **that addresses biophysical factors influencing nitrogen loss, and the sensitivity of the receiving environment to that nitrogen loss.** Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S261.020	2 Interpretation	Recognised Nitrogen Risk Assessment Tool	Oppose	Notes contention with the efficacy of nitrogen risk assessment tools. Considers there a gap from the lack of reference to a widely acceptable tool. Considers it inappropriate to delegate councils the ability to approve a tool, noting that a plan change will be required to include such a tool.	Amend as follows: The tool that provides a quantitative assessment of risk of difuse nitrogen discharge from rural land that **has been included in the plan using a plan change or variation** ~~has been approved for use as a recognised risk assessment tool by the Wellington Regional Council.~~ Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.021	2 Interpretation	Replanting	Not Stated	Seeks full text is referenced to assist plan users.	Include full text of definition. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.022	2 Interpretation	Sacrifice paddocks	Not Stated	Seeks for the meaning set out in Regulation 3 of the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 be set out in full for ease of use, consistent with PC1's treatment of the definition of "threatened species".	Amend as follows:**means an area on which--** **(a) cattle are repeatedly, but temporarily, contained (typically during extended periods of wet weather); and** **(b) the resulting damage caused to the soil by pugging is so severe as to require resowing with pasture species** **Any further consequential or alternative relief as may be necessary and appropriate to address concerns.**
S261.023	2 Interpretation	Stocking rate	Support	Supports giving effect to NPS-FM provisions.	Retain as notified
S261.024	2 Interpretation	Stock unit	Support	Supports giving effect to NPS-FM provisions.	Retain as notified
S261.025	2 Interpretation	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)	Amend	Seeks full text is referenced to assist plan users.	Set text of definition for "vegetation clearance" in full. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.026	2 Interpretation	Winter Stocking rate	Support	Supports giving effect to NPS-FM provisions.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S261.027	3 Objectives	Objective O19: Biodiversity, aquatic ecosystem health and mahinga kai in freshwater bodies and the coastal marine area are safeguarded.	Amend	Considers water quality parameters in Table 3.4 remain relevant to the Whaitua, which have not been carried over to the new target tables.	Carry parameters through to new tables for the whaitua. Refer relief sought for table 3.4 and the new table on water quality in the new Whaitua chapters. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.028	3 Objectives	Table 3.4 Rivers and Streams.	Oppose	Considers water quality parameters in Table 3.4 remain relevant to the Whaitua, which have not been carried over to the new target tables.	Retain the application of nuisance macrophytes, periphyton cover, toxicants, and mahinga kai targets to the new whaitua chapters. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.029	3 Objectives	Table 3.6 Groundwater.	Oppose	Considers the table remains relevant to the Whaitua and that no replacement targets are provided.	Retain the application of table 3.6 to the Whaitua. Amend to include nitrate-nitrogen target of < 1.0 mg/L. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.030	3 Objectives	Table 3.7 Natural wetlands.	Amend	Considers the table remains relevant to the Whaitua and that no replacement targets are provided. Seeks amendment to provide clearer target states using the wetland condition index.	Retain the application of table 3.7 to the Whaitua. Add the wetland condition index as a measure of wetland ecosystem health and set a target of 10. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.031	3 Objectives	Table 3.8 Coastal waters.	Amend	Considers key Table 3.8 parameters remain relevant to the Whaitua and have not been carried over to the new target tables. Seeks these are retained to give effect to the NPSFM and NZCPS.	Retain the application of attributes which are in this table but not in the new table 8.1 and 9.1 (or carry them through to the new tables). Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.032	4 Policies	Policy P78: Managing	Not Stated	Seeks the note is included fully within the policy to give effect to the NPSFM.	Delete the word "note" Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

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		point source discharges for aquatic ecosystem health and mahinga kai.			
S261.033	5.1 Air quality rules	General conditions for the discharge of agrichemicals.	Support	Supports consistency with the NZCPS and NPSFM.	Retain as proposed.
S261.034	5.4 Beds of lakes and rivers	Beds of lakes and rivers general conditions.	Support	Supports greater clarity.	Retain as proposed.
S261.035	5.4 Beds of lakes and rivers	Rule R128: New structures - permitted activity.	Amend	Supports the exclusion of "erosion protection structures", however, notes the provision for "debris arrestor structures" and "structures associated with vegetative edge protection" up to 10m2 can alter the natural character and habitat of rivers. Considers this frustrates the ability to achieve outcomes of NPSFM Policy 7 and 9; and NRP Policy 30.	Remove permitted status for "debris arrestor structures" and "structures associated with vegetative edge protection" to ensure these activities are managed in a way that maintains and restores physical habitat in riverbeds and natural form and character. Introduce a condition of the rule (in the general conditions) that requires compliance with Target Attribute States. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.036	5.4 Beds of lakes and rivers	Rule R132: Minor sand and gravel extraction - permitted activity.	Amend	Notes compliance with target attribute states is required to give effect to NPSFM Policy 7 and 9; the requirement to manage water bodies to achieve all five components of ecosystem health; and NRP Policy 30.	Amend general conditions in accordance with relief sought for Rule R128. Include target states for habitat and natural form and character. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S261.037	5.4 Beds of lakes and rivers	Rule R133: Gravel extraction for flood protection purposes or erosion mitigation inside sites of significance - discretionary activity.	Amend	Considers the discretion provided by the rule should be provided to other water bodies, particularly Outstanding Waterbodies, to ensure consistency with NPSFM Policy 7 and 9; and NRP Policy 30.	Include Schedule A1, A2, and A3 in R133 as areas where excavation, deposition, or disturbance are discretionary activities. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.038	5.4 Beds of lakes and rivers	Rule R145: All other uses of river and lake beds - discretionary activity.	Amend	Considers prohibited activity status provides most certainty to achieve the policy direction of the NPSFM and RMA, including protection of fish passage.	Remove the word "note". Make placement of passive gates prohibited (i.e., strengthen rule beyond NES minimum). Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.039	5.4 Beds of lakes and rivers	Rule R151A: Ongoing diversion of a river - permitted activity.	Oppose	Considers the rule enables an established diversion to continue indefinitely, regardless of size or effects. Considers such diversion should be subject to assessments and consenting to manage effects on natural form, character and health; ecosystem health; and Te Mana o te Wai. Considers permitted activity status inappropriate and that greater scope is required to manage potential ongoing effects.	Make a discretionary activity. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.040	6 Other methods	Method M36: Freshwater Action Plan programme.	Support	Supports consistency with NPSFM.	Retain as proposed. Note relief sought for Schedule 27 A2.

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S261.041	6 Other methods	Method M37: Freshwater Action Plan for the Parangarahu Lakes.	Support	Supports consistency with NPSFM.	Retain as proposed.
S261.042	6 Other methods	Method M38: Freshwater Action Plan for the Rangituhi catchment.	Support	Supports consistency with NPSFM.	Retain as proposed.
S261.043	6 Other methods	Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Support	Supports consistency with NPSFM, particularly Policies 7 and 9; and consistency with NRP Policy 30	Retain as proposed. Note relief sought for Schedule 27 A2.
S261.044	6 Other methods	Method M40: Fish	Amend	Considers prioritisation of areas for restoration of fish passage should be based on both species	Amend clause (b):

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		passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.		presents in the catchment, as well as the area and quality of the habitat that would become available, noting that providing access for valuable species to poor habitat may be less effective than restoring access to higher quality habitat elsewhere.	(b) prioritising remediation of fish passage (if appropriate to protect species) in locations highly valued for their indigenous fish and mahinga kai species **in places where this would provide access to high quality habitat or large areas of habitat** Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.045	6 Other methods	Method M41: Identifying and responding to degradation in freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Support	Supports consistency with NPSFM.	Retain as proposed.
S261.046	6 Other methods	Method M43: Supporting the health of urban waterbodies.	Amend	Notes the RMA definition of "waterbody" does not capture estuaries or harbours. Considers reference to wetlands necessary to give effect to Policy 6 and section 3.22 of the NPSFM. Considers the method insufficient to manage pollution from the public and the potential to strengthen bylaws related to urban pollution.	Amend as follows: Include direction to investigate regulating / requiring water sensitive design, rather than just providing 'education' on it, if not otherwise included in PC1. Amend chapeau: Wellington Regional Council will undertake programme(s) to

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					support the health of waterbodies **and coastal water,** including rivers and streams, **wetlands,** estuaries and harbours, impacted by urban activities, including to: Include in M43 (a) that GWRC will investigate how it can strengthen stormwater, waste, and trade waste bylaws to reduce pollution, including from car washing on driveways and streets. Include in M43 (b) (i) that education materials will also be targeted at the public to cover activities like washing cars on driveways and on the street, pool water discharges, etc. Amend (b)(ii): investigate options to reduce the hydrological impacts on freshwater bodies **and coastal water** of stormwater capture... Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.047	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Amend	Notes the RMA definition of "waterbody" does not capture estuaries or harbours. Considers reference to wetlands necessary to give effect to Policy 6 and section 3.22 of the NPSFM.	Amend as follows: Wellington Regional Council, working with primary sector organisations, will undertake a programme(s) to support the health of waterbodies **and coastal water,** including rivers, streams, **wetlands,** estuaries and harbours, impacted by rural activities, including to: Add new clause:**(e) investigate options, including financial support and rates relief options, education, advice, and provision of plants, to encourage and enable wetland restoration** Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.048	6 Other methods	Method M45: Funding of	Support	Considers funding and investment are required to meet outcomes.	Retain as notified.

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		wastewater and stormwater network upgrades			
S261.049	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.	Amend	Considers the explanation of the wai ora state should form part of the objective, rather than being a note which can be argued to have no legal effect. Considers 2100 too far away to achieve wai ora, highlighting biodiversity loss and climate change as current threats. Suggests that different target timeframes could be provided for part FMUs, per the level of degradation in each catchment. Notes some places may already be in a wai ora state.	Amend as follows: The health of all freshwater bodies, **ephemeral watercourses,** and the coastal marine area... Delete the word "note". Retain the balance of the objective. Amend the target timeframe to be 2050, or to provide part-FMU / catchment specific timeframes that account for the relative ease/difficulty of achieving targets in different catchments. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.050	8 Whaitua Te Whanganui-a-Tara	Objective WH.O2: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands	Amend	Considers 2040 too far away to achieve "maintained" water quality, noting the intent of the Essential Freshwater program to halt freshwater degradation and "start making immediate improvements so water quality improves within five years". Notes biodiversity loss and climate change as current threats. Seeks reference to ephemeral watercourses, as they can support high ecological values.	Amend as follows: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers, **ephemeral watercourses,** and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora, such that by **2030** ~~2040:~~ Include reference to natural form and character in clause (a) and refer to ecosystem health i.e.: "(a) water quality, habitats, **natural form and character...** are at a level where the state of ~~aquatic life~~ **ecosystem health** is meaningfully improved..."

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		and their margins are on a trajectory of measurable improvement towards wai ora.			Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.051	8 Whaitua Te Whanganui-a-Tara	Objective WH.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved to achieve the coastal water objectives set out in Table 8.1.	Oppose	Considers timeframe too far away to ensure coastal values in Te Whanganui-a-Tara are not compromised.	Amend timeframe for achievement to 2030. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.052	8 Whaitua Te Whanganui-a-Tara	Table 8.1 Coastal water objectives.	Oppose	Considers key coastal water quality parameters are missing. Considers more stringent timeframes are required.	Include a parameter for Turbidity:**(Unit: NTU; Statistic: Turbidity must be maintained at or below the current annual median or at or below pre-existing levels, whichever is lesser; Te Whanganui-a-Tara Harbour and**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					estuaries, Makara Estuary, Wainuiomata Estuary: <6.9; Wai Tai: No discernible change) Add further parameters (for example lead, dissolved oxygen, temperature, pH, secchi depth, chlorophyll-a, total phosphorous, total nitrogen, nitrite-nitrate nitrogen, ammoniacal nitrogen, and faecal coliforms) to ensure narrative objectives in Table 3.8 of the Operative Plan are met. Amend Wai Tai unit for Enterococci: ~~<200~~ **<40** Add interim timeframes as per NPSFM 3.11. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.053	8 Whaitua Te Whanganui-a-Tara	Objective WH.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased and the long-term population numbers of these species and the	Oppose	Notes the NPSFM refers to "threatened species" rather than "threatened freshwater species", and that some species that rely on freshwater for part of their life cycle will not constitute "freshwater species". Notes amendment is also needed to definition. Seeks to avoid conflation between freshwater species habitat and threatened species direction from the NPSFM.	Amend as follows: The extent, condition, and connectivity of habitats of nationally threatened ~~freshwater~~ species are increased, and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status. Retain balance of policy to provide direction for protection and monitoring of habitat. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		area over which they occur are increased, improving their threat classification status.			
S261.054	8 Whaitua Te Whanganui-a-Tara	Objective WH.O5: By 2040 the health and wellbeing of the Parangarahu Lakes and associated natural wetlands are on a trajectory of improvement towards wai ora.	Amend	Considers timeframe too far away to ensure coastal values are not compromised.	Amend timeframe for achievement to 2030. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.055	8 Whaitua Te Whanganui-a-Tara	Table 8.2 Target attribute states for lakes.	Oppose	Notes Table 8.2 does not carry though measures of lake ecosystem health from Table 3.5 of the NRP. Considers interim states should be set out for 2033 at the latest, in accordance with the NPSFM.	Amend Table 8.2 to include the attributes from Table 3.5 which previously applied but have not been carried over. Amend the timeframe for achievement of states to 2030, and/or set out interim target states if the timeframe remains 2040. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

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S261.056	8 Whaitua Te Whanganui-a-Tara	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	Support	Supports giving effect to the NPSFM.	Retain as proposed
S261.057	8 Whaitua Te Whanganui-a-Tara	Objective WH.O7: The physical integrity of aquitards is protected so that confined aquifer pressures are maintained.	Support	Supports giving effect to the NPSFM.	Retain as proposed
S261.058	8 Whaitua Te Whanganui-a-Tara	Objective WH.O8: Primary contact sites within Te Awa Kairangi/Hutt River, Pākuratahi River, Akatarawa River and	Amend	Considers 2040 too far away to achieve "at least maintained" water quality, noting the intent of the Essential Freshwater program to halt freshwater degradation and "start making immediate improvements so water quality improves within five years".	Shorten timeframe to 2030 Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

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		Wainuiomata River are suitable for primary contact.			
S261.059	8 Whaitua Te Whanganui-a-Tara	Table 8.3 Primary contact site objectives in rivers.	Not Stated	Considers interim states should be set out for 2033 at the latest, in accordance with the NPSFM.	Set targets for 2030 and outline date from which maintenance will be continued. If date remains 2040, set out interim states at no longer than 10-year intervals. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.060	8 Whaitua Te Whanganui-a-Tara	Objective WH.O9: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Amend	Considers natural form and character a key value of rivers and streams in Te Whanganui-a-Tara area and is directed as a potential value in the NPSFM. Considers protection of natural form and character is required to protect habitat.	Amend as follows: Water quality, habitats, **natural form and character,** water quantity and ecological processes... Amend Table WH.O9 to include physical habitat and natural form and character attributes. Retain balance of objective. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.061	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Amend	Considers it is unclear what river types are covered by each part FMU. Considers periphyton targets should be no higher than 120 mg. Considers nitrate toxicity irrelevant to ecology. Considers there are more ecologically sound values for DIN targets. Considers it unclear how fish community health will be determined and how it is different to IBI. Considers MCI targets should be higher to protect ecosystem health. Considers attributes are missing to set out and monitor habitat and natural form and character, as directed by the NPSFM and NRP,	State river type and class for each of the part FMUs. Set a minimum target state for periphyton biomass for all part FMUs at NPSFM band of 120 mg chl-a (and retain higher targets where included). Amend nitrate toxicity target to be NPSFM 'A' band for all part FMUs. Retain DIN target states where they are set below 0.3 mg/L. Amend others to be 0.3 mg/L (median) for good rivers (type

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				noting that sediment is not a sufficient measure of physical habitat alone. Considers interim timeframes of less than 10 years are required where long-term timeframes are set out. Considers groundwater targets are needed. Notes macrophyte targets are missing.	1 and 4) 0.6 for medium rivers (type 2 and 3) and 1.0 for poor rivers (type 5 & 6). Minimum DIN target no higher than 1.0. Define fish community health, as determined by experts. Set higher targets for MCI attributes Retain 'nuisance macrophytes', 'periphyton cover', mahinga kai, and toxicants attributes from table 3.4 Retain groundwater attributes from table 3.6 Amend table (or add another table) to include target attribute states for habitat and natural form and character using the Habitat Quality / Natural Character Index. Minimum targets which set out a target of maintenance of habitat quality / natural character (e.g., minimum ratio of current: reference condition of 1.0). Amend target timeframe to 2030 and outline date from which maintenance will be continued as per NPSFM 3.11. If date remains 2040, set out interim states at no longer than 10-year intervals. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.062	8 Whaitua Te Whanganui-a-Tara	Policy WH.P1: Improvement of aquatic ecosystem health.	Amend	Seeks explicit provision for natural form and character. Seeks inclusion of direction that "enhancement" of flows should be through limits and natural means, rather than "stream augmentation" or managed aquifer recharge.	Amend (b) to read "restoring habitats **and natural form and character"** Amend (c) to include **"by setting limits and reducing allocation volumes in over-allocated catchments, and by restoring natural form and character to promote natural aquifer recharge"** Retain balance of policy.

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					Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.063	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	Supports prohibition of unplanned greenfield development, however opposes clause (a). Considers financial contributions as compensatory measures for stormwater contamination contrary to RMA s107, the NZCPS, and the effects management hierarchy under the NPSM. Considers financial contributions are not an "offset". Considers livestock should be excluded from ephemeral watercourses, estuaries and wetlands, as they have high ecological value. Considers additional direction is required to give clear scope for managing rural land uses.	Amend (a): prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants **so that adverse effects are avoided** ~~and requiring financial contributions as to offset adverse effects from residual stormwater contaminants~~ Amend clause (e) so that it refers to ephemeral watercourses, wetlands and estuaries. Add clause:**(i) land use intensification that individually or cumulatively may lead to a decline in water quality is prohibited** Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.064	8 Whaitua Te Whanganui-a-Tara	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Support	Supports meeting NPSFM direction	Retain as notified.
S261.065	8 Whaitua Te Whanganui-a-Tara	Policy WH.P4: Achievement of the visual clarity target	Support	Supports meeting NPSFM direction	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		attribute states.			
S261.066	8 Whaitua Te Whanganui-a-Tara	Table 8.5: Sediment load reductions required to achieve the visual clarity target attribute states.	Amend	Notes the NPSM requires interim timeframes for Target Attribute States of no more than 10 years.	Shorten timeframes to 2030 or provide interim goals Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.067	8 Whaitua Te Whanganui-a-Tara	Policy WH.P5: Localised adverse effects of point source discharge.	Oppose	Considers the policy too narrow, noting it repeats matters from RMA s70, which is not limited to point sources discharges. Seeks the policy is broadened to capture all discharges.	Policy WH.P5: ~~Localised~~ adverse effects of ~~point source~~ discharge The localised adverse effects of ~~point source~~ discharges to freshwater and coastal water beyond the zone of reasonable mixing are avoided or minimised, including by avoiding: Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.068	8 Whaitua Te Whanganui-a-Tara	Policy WH.P6: Cumulative adverse effects of point source discharges.	Support	Supports giving effect to NPSFM by improving discharge management.	Retain as notified.
S261.069	8 Whaitua Te Whanganui-a-Tara	Policy WH.P7: Discharges to groundwater.	Amend	Supports protection and restoration of groundwater to support ecosystem health and drinking water values.	Retain and support policy with an objective with target attribute states for groundwater quality, including a target of < 1.0 mg/L nitrate-nitrogen for groundwater to protect human and ecosystem health. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S261.070	8 Whaitua Te Whanganui-a-Tara	Policy WH.P8: Avoiding discharges of specific products and waste.	Amend	Seeks for referenced discharges to be broadened to include anything at a concentration that may kill fish.	Add clauses:**(e) rubbish** **(f) agrichemicals, fertilisers, persistent chemicals** **(g) any other material that may kill fish** Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.071	8 Whaitua Te Whanganui-a-Tara	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Amend	Seeks additional toxicants are referred to protect ecosystem health, noting they are already in Table 3.4 and should be carried through.	Amend to widen reference to include other toxicants, as per the NRP Table 3.4 (ANZG (2018) Default Guideline Values). i.e.: "...managed so that the baseline water quality state for **toxicants, including** copper and zinc, is maintained, or improved where degraded, including in the relevant..." Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.072	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	Support	Supports achievement of ecosystem health	Retain as notified.
S261.073	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial	Amend	Considers higher levels of control are required where stormwater is coming from a high risk location	Require resource consent for discharges of stormwater from high risk areas. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		or trade premises.			
S261.074	8 Whaitua Te Whanganui-a-Tara	Policy WH.P12: Managing stormwater from a port or airport.	Amend	Considers higher levels of control are required where stormwater is coming from a high risk location	Require resource consent for discharges of stormwater from high risk areas. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.075	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Considers reducing adverse effects to "the extent practicable" enables cost considerations to be factored into decision-makers, which often avoid more environmentally responsible approaches. Considers reference to "where possible" is required.	Amend as follows: The adverse effects of stormwater discharges from new greenfield development shall be minimised, and adverse effects of stormwater discharges from existing urban areas reduced to the extent **possible** ~~practicable,~~ Insert direction requiring water sensitive design for new and redeveloped areas. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.076	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Oppose	Considers higher order direction, including the NZCPS and NPSM, do not provide for offsetting and compensation as expressed in the policy. Considers financial contributions are compensation and not an offset.	Amend to require adverse effects of residual stormwater contaminants to be **"avoided, remedied, or mitigated".** Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.077	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned	Support	Considers the policy direction reflects the NZCPS and NPSFM.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		greenfield development.			
S261.078	8 Whaitua Te Whanganui-a-Tara	Policy WH.P17: General wastewater policy to achieve target attribute states and coastal objectives.	Support	Considers the policy direction reflects the NPSFM.	Retain but changes to timeframe may be required to ensure there and interim timeframes consistent with NPSFM direction in s3.11. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.079	8 Whaitua Te Whanganui-a-Tara	Policy WH.P18: Progressing works to meet Escherichia coli target attribute states.	Support	Considers the policy direction reflects the NPSFM.	Retain as notified.
S261.080	8 Whaitua Te Whanganui-a-Tara	Policy WH.P19: Managing wastewater network catchment discharges.	Amend	Considers stronger policy is needed to give effect to NPSFM.	Amend clause (c) as follows:**"eliminate dry weather discharges** by progressively reducing the frequency and/or volume of dry weather discharges or the..." Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.081	8 Whaitua Te Whanganui-a-Tara	Policy WH.P20: Managing existing wastewater treatment	Amend	Considers the policy only comments on maintaining or improving discharge quality where targets are already met.	Include explicit point about reducing e coli loads where target states are currently not met. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

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		plant discharges .			
S261.082	8 Whaitua Te Whanganui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Amend	Considers ephemeral watercourses and estuaries should be referred in clause (d), as they can support high ecological values.	Amend as follows: "(d) excluding stock from water bodies, **ephemeral watercourses, and the coastal marine area** as a limit on land use," Retain balance of policy. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.083	8 Whaitua Te Whanganui-a-Tara	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Oppose	Considers the policy only directs reduction of discharges on large properties and horticultural properties, which risks not capturing discharges that cumulatively are significant. Notes the efficacy of the policy is contingent on an adequate nitrogen risk assessment tool, and this will be unlawfully delegated to Council to approve per its definition. Supports the remaining policy direction.	Amend to provide council scope to require reductions in discharges from smaller land parcels. See relief sought for definition of "recognised nitrogen risk assessment tool". Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.084	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land	Support	Supports providing a mechanism to reduce sediment loads, therefore protecting rivers and receiving environments from the adverse effects of sediment.	Retain as notified.

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		with high risk of erosion.			
S261.085	8 Whaitua Te Whanganui-a-Tara	Policy WH.P24: Phasing of farm environment plans.	Amend	Considers deposited sediment is also an important measure of sediment movement through catchments, and of ecological consequence for native species.	Amend to include deposited sediment: "prioritises those part Freshwater Management Units where Table 8.4 shows that suspended fine sediment **or deposited fine sediment** has a baseline state of D and/or where dissolved inorganic nitrogen is shown as being in need of improvement" Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.086	8 Whaitua Te Whanganui-a-Tara	Policy WH.P25: Managing rural land use change.	Support	Supports giving effect to NPSFM	Retain as notified.
S261.087	8 Whaitua Te Whanganui-a-Tara	Policy WH.P26: Managing livestock access to small rivers.	Support	Supports additional direction to ensure water quality outcomes are met, however considers it should be more specific and applied more widely to manage e coli and sediment in all FMUs and part FMUs.	Include detail in the policy on where stock should be restricted from and by how much (e.g., 5m setback), and the frequency. Extend application of policy to all FMUs and part FMUs. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.088	8 Whaitua Te Whanganui-a-Tara	Policy WH.P27: Promoting stream shading.	Amend	Considers stream shade restoration can improve water quality and habitat beyond meeting periphyton targets e.g. temperature, food provision and leaf litter provision. Considers stronger direction on stream shading is justified.	Amend as follows: Contribute to the achievement of aquatic ecosystem health by ~~promoting~~ **requiring** the progressive shading of streams ~~where nutrient reductions alone will be insufficient to achieve periphyton target attribute states.~~ Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.089	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions	Amend	Considers retirement of high risk land is required to achieve water quality outcomes. Considers larger setbacks are required and limits on the area of exposed soil are also required.	Include direction that large setbacks are required in areas of plantation forestry and include a cap on the area logged in one harvest (or direct selective harvesting where not all trees are taken out).

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		in sediment discharges from plantation forestry.			Retain (c). Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.090	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Amend	Considers setback distances from waterways (of 10m or more) are an effective method of ensuring fine sediment particles from earthworks are removed.	Add new clause:**(x) requiring setback distances, of no less than 10 metres, from surface water bodies, ephemeral watercourses, and the coastal marine area.** Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.091	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Amend	Considers controls on deposited sediment are also required	Amend to include new clause:**(e) the discharge shall not, after the zone of reasonable mixing, result in:** **(i) a change in deposited sediment cover of more than 20%, or** **(ii) an increase in deposited sediment to be more than 20% of the bed** Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.092	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Support	Supports reduction of sediment degrading ecosystems.	Retain as notified
S261.093	8 Whaitua Te Whanganui-a-Tara	Policy WH.P32: Minimum flows and minimum water levels in Whaitua Te	Support	Considers 90% of MALF is consistent with proposed NES on Ecological Flows and Water Levels.	Retain as notified

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		Whanganui-a-Tara.			
S261.094	8 Whaitua Te Whanganui-a-Tara	Policy WH.P33: Core allocation in Whaitua Te Whanganui-a-Tara.	Oppose	Notes the NRP states over-allocation will be considered through the Whaitua Implementation Programme, but the policy direction is not amended accordingly. Considers flow and allocation limits for Whaitua Te Whanganui-a-Tara do not give effect to the NPSM or the purpose of the Act. Considers interim limits need to be set to ensure life supporting capacity requirements for indigenous species are safeguarded.	Amend and include further provisions to direct phase out of over-allocation, set interim flow and allocation limits that give effect to NPSFM Policy 11, and safeguard the life-supporting capacity requirements of indigenous species that rely on water, pending any separate plan change. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.095	8 Whaitua Te Whanganui-a-Tara	Rule WH.R1: Point source discharges of specific contaminants - prohibited activity.	Support	Supports meeting NPSFM direction and water quality outcomes	Retain as proposed
S261.096	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Neutral	Not stated	Retain as notified
S261.097	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water -	Support	Supports giving effect to NPSFM and RMA	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
S261.098	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Support	Not stated	Retain as notified
S261.099	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Oppose	Considers greater Council oversight is required for elements of the rule, noting clause (h) is not sufficiently certain and enforceable for a permitted activity. Considers higher activity status and adding clearer and enforceable standards are required to ensure compliance with RMA s70, and that cumulative significant adverse effects do not arise. Considers WSUD should be required at minimum.	Reclassify as a controlled activity. Include enforceable alternative standards. Distinguish between discharges that would not have significant adverse effects on aquatic life and those having such effects that then require consent under a higher activity classification. Require "water sensitive urban design" as a condition of consent, including rainwater storage tanks at a property level (which are accessible to provide water for gardening and emergency water supply) and stormwater treatment via wetlands, swales, and rainwater gardens. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.100	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces -	Oppose	Considers controlled activity status inappropriate, particularly as the rule has effect in the coastal environment where the NZCPS applies. Considers inability to refuse consent may not give effect to NZCPS directions and RMA s107(1) and considers higher activity status is required. Seeks deletion of clause (c) as it is inconsistent with the effects management hierarchy.	Reclassify as a discretionary activity. Delete clause (c). Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

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		controlled activity.			
S261.101	8 Whaitua Te Whanganui-a-Tara	Rule WH.R8: Stormwater from a port or airport - restricted discretionary activity.	Oppose	Considers discharges may have adverse effects beyond aquatic ecosystem health and mahinga kai, including recreational use of the CMA.	Reclassify as a discretionary activity rule or add a new matter of discretion **"adverse effects on the environment".** Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.102	8 Whaitua Te Whanganui-a-Tara	Rule WH.R9: Stormwater from a local authority or state highway network- restricted discretionary activity.	Oppose	Considers the rule does not allow all effects to be considered.	Reclassify as a discretionary activity rule. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.103	8 Whaitua Te Whanganui-a-Tara	Rule WH.R10: Stormwater from new state highways- discretionary activity.	Amend	Considers clause (c) does not reflect the effects management hierarchy.	Delete clause (c) Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.104	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped	Amend	Considers clause (b) does not reflect the effects management hierarchy.	Delete clause (b). Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		impervious surfaces - discretionary activity.			
S261.105	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Support	Supports consistency with the purpose of the RMA, in conjunction with relief sought by the submitter.	Retain as notified
S261.106	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Support	Supports meeting the purpose of the RMA.	Retain as notified
S261.107	8 Whaitua Te Whanganui-a-Tara	Rule WH.R14: Wastewater network catchment discharges - restricted discretionary activity.	Amend	Considers discretionary activity status ensure unforeseen matters can be considered.	Reclassify as a discretionary activity. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.108	8 Whaitua Te Whanganui-a-Tara	Rule WH.R15: Existing wastewater discharges	Support	Supports consistency with the purpose of the RMA.	Retain as notified

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		from a treatment plant - discretionary activity.			
S261.109	8 Whaitua Te Whanganui-a-Tara	Rule WH.R16: All other discharges of wastewater - non-complying activity.	Support	Supports consistency with the purpose of the RMA.	Retain as notified
S261.110	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity.	Oppose	Considers the removal of pest plants may still cause sediments to be released and certain pest plants may still be habitat for indigenous species. Considers additional standards are required. Considers mitigation plans are insufficient on their own; therefore seeks a minimum setback from water bodies, coastal marine area, and ephemeral watercourses, as well as a size threshold for vegetation clearance.	Amend as follows: Include additional standards:**(x) the vegetation clearance is not undertaken within, or within 10 metre setback from, a surface water body, ephemeral watercourse, or the coastal marine area** **(x) vegetation clearance does not exceed 200m2 per property in any consecutive 12-month period** Delete clause (a)(ii). In the alternative, should pest plants be referred to, create a definition of pest plants as those plants listed in the GWRC pest management plan. Introduce a requirement for pest plant removal to not exceed a given area per year - i.e. specify the 200m2 threshold, at which point WH.R18 applies. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.111	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land -	Oppose	Considers the inability to refuse consent may mean policy direction under the NPSFM or NZCPS will not be achieved. Considers higher activity status is required.	Reclassify Rule WH.R18 as a discretionary activity; or Reclassify as a restricted discretionary activity and include **"adverse effects on the environment"** as a matter of discretion.

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		controlled activity.			Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.112	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance - discretionary activity.	Support	Supports consistency with the purpose of the RMA, in conjunction with relief sought by the submitter.	Retain as notified
S261.113	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Amend	Considers the inability to refuse consent may mean policy direction under the NPSFM or NZCPS will not be achieved. Considers higher activity status is required.	Reclassify as a discretionary activity. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.114	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry - discretionary activity.	Support	Supports management of sediment from activity	Retain as notified
S261.115	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.	Support	Supports consistency with the purpose of the RMA.	Retain as notified
S261.116	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Oppose	Considers a 5m setback is insufficient to protect ecosystems and maintain water quality. Considers ephemeral watercourses should be referred to as they have ecological value and can reduce contaminant loads when protected.	Amend as follows: (d) the earthworks shall not occur within, **or within a 10** ~~5~~m **setback from,** ~~of a~~ surface water body, **ephemeral watercourse,** or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can

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					enter a surface water body, **ephemeral watercourse,** or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, **ephemeral watercourse,** the coastal marine area, or onto land that may enter a surface water body, **ephemeral watercourse** or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body, **ephemeral watercourse,** or the coastal marine area, including via a stormwater network. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.117	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Oppose	Considers the matters of discretion are not wide enough to ensure all adverse effects on all important ecological values are addressed.	Reclassify as a discretionary activity rule. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.118	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Support	Supports consistency with the purpose of the RMA, in conjunction with relief sought by the submitter.	Retain as notified
S261.119	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares	Amend	Considers information on land use pressures is critical to ensure appropriate management of inputs, setting limits on resource use, and assessing effectiveness of the plan.	Amend to include **"(e2) annual nitrogen fertiliser use, the annual stocking rate, and the winter stocking rate is provided to Wellington Regional Council annually"** Retain balance of rule. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

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		and 20 hectares - permitted activity.			
S261.120	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Amend	Considers information on farm inputs is required to ensure council has information on pressures in the catchment	Amend rule to require the reporting of N fertiliser and stocking rate regularly. Include additional conditions that will ensure drinking water, etc. is protected, should relief sought for Schedule 36 not be granted. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.121	8 Whaitua Te Whanganui-a-Tara	Table 8.6: Phase-in of farm environment plans for part Freshwater Management Units.	Support	Supports meeting NPSFM outcomes and limiting delay in implementation.	Retain as notified
S261.122	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Support	Supports meeting NPSFM outcomes, including limiting sediment and E. coli pollution.	Retain as notified
S261.123	8 Whaitua Te Whanganui-a-Tara	Rule WH.R29: Livestock access to a small river -	Support	Supports meeting NPSFM outcomes, including limiting sediment and E. coli pollution.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discretionary activity.			
S261.124	8 Whaitua Te Whanganui-a-Tara	Rule WH.R30: The use of land for farming activities - discretionary activity.	Support	Supports giving effect to NPSFM and RMA	Retain as notified
S261.125	8 Whaitua Te Whanganui-a-Tara	Rule WH.R31: Change of rural land use - discretionary activity.	Oppose	Considers a change of land use could lead to increase in contaminants, which is contrary to plan policies. Considers this may lead to decline in water quality, contrary to NPSM direction for over-allocation.	Reclassify as a non-complying activity. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.126	8 Whaitua Te Whanganui-a-Tara	Rule WH.R32: Farming activities - non-complying activity.	Support	Supports meeting NPSFM outcomes	Retain as notified
S261.127	8 Whaitua Te Whanganui-a-Tara	Rule WH.R33: Take and use of water in the Whaitua Te Whanganui-a Tara - restricted discretionary activity.	Oppose	Considers the matters of discretion are not wide enough to ensure all adverse effects on ecological and geomorphological values are addressed i.e. indigenous fish migration and emulating natural flow regimes to allow flushing of weeds and sediments. Further considers they are inconsistent with the NPSFM direction to phase-out overallocation. Seeks amendment of the rule framework for flows and allocation to ensure further over-allocation and ecosystem degradation occurs, pending a future plan change.	Reclassify as a discretionary activity. Delete the exceptions to take below minimum flow in (a), delete (b) and delete (d). Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

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S261.128	8 Whaitua Te Whanganui-a-Tara	Rule WH.R34: Take and use of water in the Whaitua Te Whanganui-a-Tara - discretionary activity.	Oppose	Considers the rule framework does not give effect to the NPSFM and does not ensure the life-supporting capacity requirements of indigenous species will be met.	Delete Rule WH.R34 so that any takes below minimum flow or in exceedance of an allocation limit defaults to prohibited status. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.129	8 Whaitua Te Whanganui-a-Tara	Rule WH.R35: Take and use of water from outstanding rivers or lakes - non-complying activity.	Support	Supports in part, provided flows and allocation limits are developed to ensure values of outstanding water bodies are protected	Retain as notified
S261.130	8 Whaitua Te Whanganui-a-Tara	Rule WH.R36: Take and use of water exceeding minimum flows or core allocation - prohibited activity.	Support	Considers defined takes below minimum flow and in exceedance of an allocation limit do not achieve direction in the NPSFM and RPS, and do not safeguard the life-supporting capacity requirements for indigenous species and should be prohibited.	Amend as follows: The take and use of water from a river (including tributaries) or groundwater in Te Whanganui-a-Tara in Tables 8.8 and 8.9, ~~that does not meet (a) or (b) of Rule WH.R33~~ **that is not provided for in Rules WH.33, R155, R156, R159, R160, or P.R30** is a prohibited activity. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.131	8 Whaitua Te	Table 8.7: Minimum flows for	Oppose	Notes the NRP states over-allocation will be considered through the Whaitua Implementation Programme, yet the policy direction is not amended	Include limits to ensure aquatic ecosystem values are safeguarded.

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	Whanganui-a-Tara	rivers in the Whaitua Te Whanganui-a-Tara.		accordingly. Considers flow and allocation limits for Whaitua Te Whanganui-a-Tara do not give effect to the NPSM or the purpose of the Act. Considers interim limits need to be set to ensure life supporting capacity requirements for indigenous species are safeguarded.	Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.132	8 Whaitua Te Whanganui-a-Tara	Table 8.8: Surface water allocation amounts for rivers and Category A groundwater and Category B groundwater in the Te Awa Kairangi/Hutt River, Wainuiomata River and Ōrongorongo River catchments.	Oppose	Notes the NRP states over-allocation will be considered through the Whaitua Implementation Programme, yet the policy direction is not amended accordingly. Considers flow and allocation limits for Whaitua Te Whanganui-a-Tara do not give effect to the NPSM or the purpose of the Act. Considers interim limits need to be set to ensure life supporting capacity requirements for indigenous species are safeguarded.	Include limits to ensure aquatic ecosystem values are safeguarded. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.133	9 Te Awarua-o-Porirua Whaitua	Objective P.O1: The health of Te Awarua-o-Porirua's groundwat	Amend	Considers the explanation of the wai ora state should form part of the objective, rather than being a note. Considers ephemeral watercourses hold ecological values and should be referred to in the chapeau. Considers 2100 too far away to achieve wai ora, highlighting biodiversity loss and climate change as current threats. Suggests that different	Include reference to **ephemeral watercourses.** Delete the word "note". Amend the target timeframe to be 2050 (rather than 2100), or provide part-FMU / catchment specific timeframes that account for the relative ease/difficulty of achieving targets in

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		er, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100.		target timeframes could be provided for part FMUs, per the level of degradation in each catchment. Notes some places may already be in a wai ora state. Considers riffle, run, pool sequences is clearer to refer to than "ripples".	different catchments. Amend "Rivers flow naturally, with ~~ripples~~ **natural riffle, run, and pool habitat** and the river beds are stony" Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.134	9 Te Awarua-o-Porirua Whaitua	Objective P.O2: Te Awarua-o-Porirua's groundwater, rivers, lakes and natural wetlands, and their margins are on a trajectory of measurable improvement towards wai ora.	Amend	Considers amendment is required to give effect to the NPSFM and RMA.	Amend chapeau: The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, **ephemeral watercourses,** and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora, such that by **2030** ~~2040~~ Include reference to natural form and character in clause (a) and refer to ecosystem health i.e.: "(a) water quality, habitats, natural form and character... are at a level where the state of aquatic life ecosystem health is meaningfully improved..." Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

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S261.135	9 Te Awarua-o-Porirua Whaitua	Objective P.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Pāuatahanui Inlet, Onepoto Arm and the open coastal areas of Te Awarua-o-Porirua is maintained or improved to achieve the coastal water objectives set out in Table 9.1.	Amend	Considers policy direction in higher order documents is achieved, however seeks shorter timeframes.	Amend timeframe to 2030. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.136	9 Te Awarua-o-Porirua Whaitua	Table 9.1: Coastal water objectives.	Oppose	Seeks further parameters and more stringent timeframes	Include a parameter for Turbidity: **(Unit: NTU; Statistic: Turbidity must be maintained at or below the current annual median or at or below pre-existing levels, whichever is lesser; Onepoto Arm: <10.8, Pauatahanui Inlet: <6.9; Open Coast: No discernible change).** Add further parameters (for lead, dissolved oxygen, temperature, pH, secchi depth, chlorophyll-a, total phosphorous, total nitrogen, nitrite-nitrate nitrogen, ammoniacal nitrogen, and faecal coliforms) to ensure

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					narrative objectives in Table 3.8 of the Operative Plan are met. Amend Open Coast unit for Enterococci: ~~<200~~ **<40** Amend timeframe to 2030 or provide interim targets as per NPSFM 3.11 requirement. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.137	9 Te Awarua-o-Porirua Whaitua	Objective P.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased, and the long-term population numbers of these species and the area over which they occur are increased, improving their threat	Amend	Notes the NPSFM refers to "threatened species" rather than "threatened freshwater species", and that some species that rely on freshwater for part of their life cycle will not constitute "freshwater species". Considers amendment is also needed to definition. Seeks to avoid conflation between freshwater species habitat and threatened species direction from the NPSFM.	Amend as follows: The extent, condition, and connectivity of habitats of nationally threatened ~~freshwater~~ species are increased, and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status. Retain balance of policy to provide direction for protection and monitoring of habitat. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

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		classification status.			
S261.138	9 Te Awarua-o-Porirua Whaitua	Objective P.O5: Groundwater flows and levels, and water quality, are maintained.	Support	Supports giving effect to the NPSFM.	Retain as proposed
S261.139	9 Te Awarua-o-Porirua Whaitua	Objective P.O6: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Amend	Considers greater provision for natural form and character is required to give effect to NPSFM and RMA	Amend as follows: "water quality, habitats, **natural form and character,** and..." Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.140	9 Te Awarua-o-Porirua Whaitua	Table 9.2: Target attribute states for rivers.	Amend	Considers it is unclear what river types are covered by each part FMU. Considers periphyton targets should be no higher than 120 mg. Considers nitrate toxicity irrelevant to ecology. Considers there are more ecologically sound values for DIN targets. Considers it unclear how fish community health will be determined and how it is different to IBI. Considers MCI targets should be higher to protect ecosystem health. Considers attributes are missing to set out and monitor habitat and natural form and character, as directed by the NPSFM and NRP,	State river type and class for each of the part FMUs. Set a minimum target state for periphyton biomass for all part FMUs at NPSFM band of 120 mg chl-a (and retain higher targets where included). Amend nitrate toxicity target to be NPSFM 'A' band for all part FMUs. Retain DIN target states where they are set below 0.3 mg/L. Amend others to be 0.3 mg/L (median) for good rivers (type

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				noting that sediment is not a sufficient measure of physical habitat alone. Considers interim timeframes of less than 10 years are required where long-term timeframes are set out. Considers groundwater targets are needed. Notes macrophyte targets are missing.	1 and 4) 0.6 for medium rivers (type 2 and 3) and 1.0 for poor rivers (type 5 & 6). Minimum DIN target no higher than 1.0. Define fish community health, as determined by experts. Set higher targets for MCI attributes Retain 'nuisance macrophytes', 'periphyton cover', mahinga kai, and toxicants attributes from table 3.4 Retain groundwater attributes from table 3.6 Amend table (or add another table) to include target attribute states for habitat and natural form and character using the Habitat Quality / Natural Character Index. Minimum targets which set out a target of maintenance of habitat quality / natural character (e.g., minimum ratio of current: reference condition of 1.0). Amend target timeframe to 2030 and outline date from which maintenance will be continued as per NPSFM 3.11. If date remains 2040, set out interim states at no longer than 10-year intervals. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.141	9 Te Awarua-o-Porirua Whaitua	Policy P.P1: Improvement of aquatic ecosystem health.	Amend	Seeks explicit provision for natural form and character. Seeks inclusion of direction that "enhancement" of flows should be through limits and natural means, rather than "stream augmentation" or managed aquifer recharge.	Amend (b) to read "restoring habitats **and natural form and character"** Amend (c) to include **"by setting limits and reducing allocation volumes in over-allocated catchments, and by restoring natural form and character to promote natural aquifer recharge"** Retain balance of policy.

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					Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.142	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	Supports prohibition of unplanned greenfield development, however opposes clause (a). Considers financial contributions as compensatory measures for stormwater contamination contrary to RMA s107, the NZCPS, and the effects management hierarchy under the NPSM. Considers financial contributions are not an "offset". Considers livestock should be excluded from ephemeral watercourses, estuaries and wetlands, as they have high ecological value. Considers additional direction is required to give clear scope for managing rural land uses.	Amend (a): prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants **so that adverse effects are avoided** ~~and requiring financial contributions as to offset adverse effects from residual stormwater contaminants~~ Amend clause (e) so that it refers to ephemeral watercourses, wetlands and estuaries. Add clause:**(i) land use intensification that individually or cumulatively may lead to a decline in water quality is prohibited** Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.143	9 Te Awarua-o-Porirua Whaitua	Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Support	Supports meeting NPSFM direction	Retain as notified
S261.144	9 Te Awarua-o-Porirua Whaitua	Policy P.P4: Contaminant load reductions.	Amend	Considers interim targets or a shorter timeframe is required.	Set targets for 2030. If date remains 2040, set out interim states at no longer than 10-year intervals. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

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S261.145	9 Te Awarua-o-Porirua Whaitua	Table 9.3: Harbour arm catchment contaminant load reductions.	Amend	Considers interim targets or a shorter timeframe is required.	Set targets for 2030. If date remains 2040, set out interim states at no longer than 10-year intervals. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.146	9 Te Awarua-o-Porirua Whaitua	Table 9.4: Part Freshwater Management Unit sediment load reductions required to achieve the visual clarity target attribute state.	Amend	Considers timeframe is required	Include a timeframe Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.147	9 Te Awarua-o-Porirua Whaitua	Policy P.P5: Localised adverse effects of point source discharges.	Amend	Considers the policy too narrow, noting it repeats matters from RMA s70, which is not limited to point sources discharges. Seeks the policy is broadened to capture all discharges.	Amend as follows: Policy P.P5: ~~Localised~~ adverse effects of ~~point source~~ discharges The localised adverse effects of ~~point source~~ discharges to freshwater and coastal water beyond the zone of reasonable mixing are avoided or minimised, including by avoiding: Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.148	9 Te Awarua-o-Porirua Whaitua	Policy P.P6: Point source	Support	Supports giving effect to NPSFM by improving discharge management.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discharges.			
S261.149	9 Te Awarua-o-Porirua Whaitua	Policy P.P7 Discharges to groundwater.	Support	Supports giving effect to NPSM	Retain and support policy with an objective with target attribute states for groundwater quality, including a target of < 1.0 mg/L nitrate-nitrogen for groundwater to protect human and ecosystem health. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.150	9 Te Awarua-o-Porirua Whaitua	Policy P.P8 Avoiding discharges of specific products and waste.	Amend	Seeks for referenced discharges to be broadened to include anything at a concentration that may kill fish.	Add clauses:**(e) rubbish** **(f) agrichemicals, fertilisers, persistent chemicals** **(g) any other material that may kill fish** Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.151	9 Te Awarua-o-Porirua Whaitua	Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Amend	Seeks additional toxicants are referred to to protect ecosystem health, noting they are already in Table 3.4 and should be carried through.	Amend to widen reference to include other toxicants, as per the NRP Table 3.4 (ANZG (2018) Default Guideline Values). i.e.: "...managed so that the baseline water quality state for **toxicants, including** copper and zinc, is maintained, or improved where degraded, including in the relevant..." Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.152	9 Te Awarua-o-Porirua Whaitua	Policy P.P10: Managing adverse effects of stormwater discharges.	Amend	Considers stronger direction is needed to give effect to NPSFM and protect water quality	Replace "where practicable" with "where possible" Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S261.153	9 Te Awarua-o-Porirua Whaitua	Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises.	Amend	Considers higher levels of control are required where stormwater is coming from a high risk location	Require resource consent for discharges of stormwater from high risk areas Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.154	9 Te Awarua-o-Porirua Whaitua	Policy P.P12: Managing stormwater network discharges through a Stormwater Management Strategy.	Neutral	Not stated	Not stated
S261.155	9 Te Awarua-o-Porirua Whaitua	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Considers reducing adverse effects to "the extent practicable" enables cost considerations to be factored into decision-makers, which often avoid more environmentally responsible approaches. Considers reference to "where possible" is required.	Amend as follows: The adverse effects of stormwater discharges from new greenfield development shall be minimised, and adverse effects of stormwater discharges from existing urban areas reduced to the extent **possible** ~~practicable,~~ Insert direction requiring water sensitive design for new and redeveloped areas. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.156	9 Te Awarua-	Policy P.P14: Stormwate	Amend	Considers higher order direction, including the NZCPS and NPSM, do not provide for offsetting and compensation as expressed in the policy. Considers	Amend to require adverse effects of residual stormwater contaminants to be **"avoided, remedied, or mitigated".**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	r contaminant offsetting for new greenfield development.		financial contributions are compensation and not an offset.	Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.157	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Support	Considers the policy direction reflects the NZCPS and NPSFM.	Retain as notified
S261.158	9 Te Awarua-o-Porirua Whaitua	Policy P.P16: General wastewater policy to achieve target attribute states and coastal water objectives.	Support	Considers the policy direction reflects the NZCPS and NPSFM.	Retain as notified
S261.159	9 Te Awarua-o-Porirua Whaitua	Policy P.P17: Progressing works to meet Escherichia coli target	Amend	Considers amendment is needed to maintain and improve water quality.	State "where possible" rather than "where practicable" Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		attribute states.			
S261.160	9 Te Awarua-o-Porirua Whaitua	Policy P.P18: Managing wastewater network catchment discharges.	Amend	Considers stronger policy is needed to give effect to NPSFM.	Amend (c) as follows:**"eliminate dry weather discharges** by progressively reducing the frequency and/or volume of dry weather discharges or the..." Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.161	9 Te Awarua-o-Porirua Whaitua	Policy P.P19: Managing existing wastewater treatment plant discharges.	Amend	Considers the policy only comments on maintaining or improving discharge quality where targets are already met.	Amend to include explicit point about reducing e coli loads where target states are currently not met. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.162	9 Te Awarua-o-Porirua Whaitua	Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Amend	Considers ephemeral watercourses and estuaries should be referred in clause (d), as they can support high ecological values.	Amend as follows: "(4) excluding stock from water bodies, **ephemeral watercourses, and the coastal marine area** as a limit on land use," Retain balance of policy. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.163	9 Te Awarua-o-Porirua Whaitua	Policy P.P21: Capping, minimising and reducing diffuse	Amend	Considers the policy only directs reduction of discharges on large properties and horticultural properties, which risks not capturing discharges that cumulatively are significant. Notes the efficacy of the policy is contingent on an adequate nitrogen risk assessment tool, which is to be unlawfully	Amend to provide council scope to require reductions in discharges from smaller land parcels. See relief sought for definition of "recognised nitrogen risk assessment tool".

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discharges of nitrogen from farming activities.		delegated to Council to approve per its definition. Supports the remaining policy direction.	Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.164	9 Te Awarua-o-Porirua Whaitua	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Support	Supports providing a mechanism to reduce sediment loads, therefore protecting rivers and receiving environments from the adverse effects of sediment.	Retain as notified
S261.165	9 Te Awarua-o-Porirua Whaitua	Policy P.P23: Phasing of farm environment plans.	Amend	Considers deposited sediment is also an important measure of sediment movement through catchments, and of ecological consequence for native species.	Amend to include deposited sediment: "prioritises those part Freshwater Management Units where Table 9.2 shows that suspended fine sediment **or deposited fine sediment** has a baseline state of D and/or where dissolved inorganic nitrogen is shown as being in need of improvement" Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.166	9 Te Awarua-o-Porirua Whaitua	Policy P.P24: Managing rural land use change.	Support	Supports giving effect to NPSFM.	Retain as notified
S261.167	9 Te Awarua-o-Porirua Whaitua	Policy P.P25: Promoting	Amend	Considers stream shade restoration can improve water quality and habitat beyond meeting periphyton targets e.g. temperature, food provision	Amend as follows: Contribute to the achievement of aquatic ecosystem health by ~~promoting~~ **requiring** the progressive shading of streams ~~where nutrient reductions alone will be insufficient to achieve~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		stream shading.		and leaf litter provision. Considers stronger direction on stream shading is justified.	~~periphyton target attribute states.~~ Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.168	9 Te Awarua-o-Porirua Whaitua	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Amend	Considers further direction is required to ensure effects are minimised.	Include direction that large setbacks are required in areas of plantation forestry and include a cap on the area logged in one harvest (or direct selective harvesting where not all trees are taken out). Retain (c). Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.169	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Amend	Considers setback distances from waterways (of 10m or more) are an effective method of ensuring fine sediment particles from earthworks are removed.	Add new clause:**(x) requiring setback distances, of no less than 10 metres, from surface water bodies, ephemeral watercourses, and the coastal marine area.** Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.170	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Amend	Considers controls on deposited sediment are also required.	Include new clause:**(e) the discharge shall not, after the zone of reasonable mixing, result in:** **(i) a change in deposited sediment cover of more than 20%, or** **(ii) an increase in deposited sediment to be more than 20% of the bed** Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.171	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Amend	Supports reduction of sediment degrading ecosystems.	Retain as notified
S261.172	9 Te Awarua-	Policy P.P30:	Support	Not stated.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	Minimum flows and minimum water levels in Te Awarua-o-Porirua Whaitua.			
S261.173	9 Te Awarua-o-Porirua Whaitua	Policy P.P31: Water takes at minimum flows and minimum water levels.	Oppose	Considers the policy is contrary to the NPSM, particularly to avoid overallocation.	Delete exceptions to Policy P.P31. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.174	9 Te Awarua-o-Porirua Whaitua	Policy P.P32: Allocation in the Te Awarua-o-Porirua Whaitua.	Support	Not stated.	Not stated
S261.175	9 Te Awarua-o-Porirua Whaitua	Rule P.R1: Point source discharges of specific contaminants - prohibited activity.	Support	Supports meeting NPSFM direction and water quality outcomes.	Retain as proposed
S261.176	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and	Oppose	Considers greater Council oversight is required for elements of the rule, noting clause (h) is not sufficiently certain and enforceable for a permitted activity. Considers higher activity status and adding	Reclassify Rule P.R5 as a controlled activity and include alternative standards that are enforceable and distinguish between discharges that would not have significant adverse effects on aquatic life and those having such effects that

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		redeveloped impervious surfaces - permitted activity.		clearer and enforceable standards are required to ensure compliance with RMA s70, and that cumulative significant adverse effects do not arise. Considers WSUD should be required at minimum.	then require consent under a higher activity classification. Explicitly require 'water sensitive urban design' as a condition of consent (as per P.R6), including rainwater storage tanks at a property level (which are accessible to provide water for gardening and emergency water supply) and stormwater treatment via wetlands, swales, and rainwater gardens. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.177	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Oppose	Considers controlled activity status inappropriate, particularly as the rule has effect in the coastal environment where the NZCPS applies. Considers inability to refuse consent may not give effect to NZCPS directions and RMA s107(1) and considers higher activity status is required. Seeks deletion of clause (c) as it is inconsistent with the effects management hierarchy.	Reclassify as a discretionary activity. Delete clause (c). Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.178	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas- controlled activity.	Amend	Considers more control is required to manage effects.	Amend to restricted discretionary Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.179	9 Te Awarua-o-Porirua Whaitua	Rule P.R8: Stormwater from a local authority or state highway	Oppose	Considers the rule does not allow all effects to be considered.	Reclassify as a discretionary activity rule. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		network-restricted discretionary activity.			
S261.180	9 Te Awarua-o-Porirua Whaitua	Rule P.R9: Stormwater from new state highways-discretionary activity.	Amend	Considers clause (c) does not reflect the effects management hierarchy.	Delete clause (c) Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.181	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Amend	Considers clause (b) does not reflect the effects management hierarchy.	Delete clause (b). Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.182	9 Te Awarua-o-Porirua Whaitua	Rule P.R11: All other stormwater discharges - non-complying activity.	Support	Supports consistency with the purpose of the RMA, in conjunction with relief sought by the submitter.	Retain as notified
S261.183	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned	Support	Supports meeting the purpose of the RMA.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		greenfield development - prohibited activity.			
S261.184	9 Te Awarua-o-Porirua Whaitua	Rule P.R13: Wastewater network catchment discharges to water - restricted discretionary activity.	Amend	Considers discretionary activity status ensure unforeseen matters can be considered.	Reclassify as a discretionary activity. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.185	9 Te Awarua-o-Porirua Whaitua	Rule P.R14: Existing wastewater discharges from a treatment plant to coastal and freshwater - discretionary activity.	Support	Supports consistency with the purpose of the RMA.	Retain as notified
S261.186	9 Te Awarua-o-Porirua Whaitua	Rule P.R15: All other discharges of wastewater - non-	Support	Supports consistency with the purpose of the RMA.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		complying activity.			
S261.187	9 Te Awarua-o-Porirua Whaitua	Rule P.R16: Vegetation clearance on highest erosion risk land-permitted activity.	Oppose	Considers the removal of pest plants may still cause sediments to be released and certain pest plants may still be habitat for indigenous species. Considers additional standards are required. Considers mitigation plans are insufficient on their own; therefore seeks a minimum setback from water bodies, coastal marine area, and ephemeral watercourses, as well as a size threshold for vegetation clearance.	Include additional standards:**(x) the vegetation clearance is not undertaken within, or within 10 metre setback from, a surface water body, ephemeral watercourse, or the coastal marine area** **(x) vegetation clearance does not exceed 200m2 per property in any consecutive 12-month period** Delete clause (a)(ii). In the alternative, should pest plants be referred to, create a definition of pest plants as those plants listed in the GWRC pest management plan. Introduce a requirement for pest plant removal to not exceed a given area per year - i.e. specify the 200m2 threshold, at which point P.R17. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.188	9 Te Awarua-o-Porirua Whaitua	Rule P.R17: Vegetation clearance on highest erosion risk land - controlled activity.	Oppose	Considers the inability to refuse consent may mean policy direction under the NPSFM or NZCPS will not be achieved. Considers higher activity status is required.	Reclassify Rule P.R17 as a discretionary activity; or Reclassify as a restricted discretionary activity and include **"adverse effects on the environment"** as a matter of discretion. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.189	9 Te Awarua-o-Porirua Whaitua	Rule P.R18: Vegetation clearance - discretionary activity.	Support	Supports consistency with the purpose of the RMA, in conjunction with relief sought by the submitter.	Retain as notified
S261.190	9 Te Awarua-	Rule P.R19: Plantation	Amend	Considers the inability to refuse consent may mean policy direction under the NPSFM or NZCPS will not	Reclassify as a discretionary activity.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	forestry - controlled activity.		be achieved. Considers higher activity status is required.	Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.191	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry - discretionary activity.	Support	Supports management of sediment issues.	Retain as notified
S261.192	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity.	Support	Supports avoidance of sediment issues.	Retain as notified
S261.193	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Oppose	Considers a 5m setback is insufficient to protect ecosystems and maintain water quality. Considers ephemeral watercourses should be referred to as they have ecological value and can reduce contaminant loads when protected.	Amend as follows: (d) the earthworks shall not occur within, **or within a 10** ~~5~~m **setback from,** ~~of a~~ surface water body, **ephemeral watercourse,** or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body, **ephemeral watercourse,** or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, **ephemeral watercourse,** the coastal marine area, or onto land that may enter a surface water body, **ephemeral watercourse** or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body, **ephemeral watercourse,** or the coastal marine area, including via a

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					stormwater network. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.194	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Oppose	Considers the matters of discretion are not wide enough to ensure all adverse effects on all important ecological values are addressed.	Reclassify as a discretionary activity rule. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.195	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks - non-complying activity.	Support	Supports consistency with the purpose of the RMA, in conjunction with relief sought by the submitter.	Retain as notified
S261.196	9 Te Awarua-o-Porirua Whaitua	Rule P.R25: Farming activities on properties of between 4 hectares and 20 hectares - permitted activity.	Amend	Considers information on land use pressures is critical to ensure appropriate management of inputs, setting limits on resource use, and assessing effectiveness of the plan.	Amend to include **"(e2) annual nitrogen fertiliser use, the annual stocking rate, and the winter stocking rate is provided to Wellington Regional Council annually"** Retain balance of rule. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.197	9 Te Awarua-o-Porirua Whaitua	Rule P.R26: Farming activities on 20 hectares or more of land -	Amend	Considers information on farm inputs is required to ensure council has information on pressures in the catchment.	Amend rule to require the reporting of N fertiliser and stocking rate regularly. Include additional conditions that will ensure drinking water, etc. is protected, should relief sought for Schedule 36 not be granted. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
S261.198	9 Te Awarua-o-Porirua Whaitua	Table 9.5: Phase in of farm environment plans for Part Freshwater Management Units.	Support	Supports meeting NPSFM outcomes and limiting delay in implementation.	Retain as notified
S261.199	9 Te Awarua-o-Porirua Whaitua	Rule P.R27: The use of land for farming activities - discretionary activity.	Support	Supports giving effect to NPSFM and RMA	Retain as notified
S261.200	9 Te Awarua-o-Porirua Whaitua	Rule P.R28: Change of rural land use - discretionary activity.	Oppose	Considers a change of land use could lead to increase in contaminants, which is contrary to plan policies. Considers this may lead to decline in water quality, contrary to NPSM direction for over-allocation.	Reclassify as a non-complying activity. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.201	9 Te Awarua-o-Porirua Whaitua	Rule P.R29: Farming activities - non-complying activity.	Support	Supports meeting NPSFM outcomes.	Retain as notified
S261.202	9 Te Awarua-o-Porirua Whaitua	Rule P.R30: Take and use of	Amend	Considers further parameters are required.	Add new clause:**(x) the rate of take from a river does not exceed whichever is the lesser of:** **a) 10% of the instantaneous flow at the point and time of take, or**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		water - permitted activity.			**b) An absolute limit of 2.5 l/s.** Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.203	9 Te Awarua-o-Porirua Whaitua	Rule P.R31: Take and use of water - restricted discretionary activity.	Oppose	Considers only prohibited activity status is appropriate for water takes below a minimum flow or water level. Considers restricted discretionary activity status is particularly problematic in light of the policies. Considers there is potential for cumulative effects from multiples takes that may not be easily detected through individual applications. Considers Council must be able to review existing consents to bring them in line with new flows and limits and that takes below minimum flow and in exceedance of an allocation needs to be assigned Prohibited status.	Delete Rule P.R31. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.204	9 Te Awarua-o-Porirua Whaitua	Rule P.R32: Take and use of water - discretionary activity.	Oppose	Considers flows, levels and taken limits are a mixture of policies and rules, but should all be stated as rules.	Delete Rule P.R32 and revise rule framework to enable existing consents to be brought in line with new flows and limits. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.205	9 Te Awarua-o-Porirua Whaitua	Rule P.R33: Taking and use of water that exceeds minimum flows or allocation amounts - prohibited activity.	Oppose	Considers defined takes below minimum flow and in exceedance of an allocation limit do not achieve direction in the NPSFM and RPS, and do not safeguard the life-supporting capacity requirements for indigenous species and should be prohibited.	Amend as follows: In any catchment management unit listed in Table 9.6 the take and use of water from a river, Category A groundwater or Category B groundwater, ~~that does not meet conditions (a) or (b) of Rule P.R31~~ **that is not provided for in Rules R155, R156, R159, R160, or P.R30** is a prohibited activity. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.206	9 Te Awarua-	Table 9.6: Minimum flows for	Oppose	Opposes in part.	Ensure limits are adequate to safeguard aquatic ecosystems.

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	o-Porirua Whaitua	Te Awarua-o-Porirua Whaitua.			Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.207	9 Te Awarua-o-Porirua Whaitua	Table 9.7: Surface water allocation amounts for Te Awarua-o-Porirua Whaitua.	Oppose	Opposes in part, as it is uncertain if the limits will ensure aquatic ecosystems and indigenous species are safeguarded.	Not stated
S261.208	12 Schedules	Schedule A: Outstanding water bodies	Amend	Considers outstanding water bodies need to be listed and mapped.	List and map outstanding water bodies in the area that are streams/rivers/wetlands, including Te Awakairangi, the Akatarawa River, and the Pakuratahi River. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.209	12 Schedules	Schedule A2: Lakes with outstanding indigenous ecosystem values.	Amend	Considers further detail is required to ensure values can be protected	List Indigenous fish diversity as a value of Lake Wairarapa (Wairarapa Moana). Note threatened fish species known to be present for each lake. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.210	12 Schedules	Schedule F: Ecosystems and habitats with significant indigenous biodiversity values.	Neutral	Notes additional detail is forthcoming from the DOC report on habitat requirements of native fish.	Consider including additional detail in soon-to-be published DOC literature review of habitat requirements of native fish species. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

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S261.211	12 Schedules	Schedule F1: Rivers and lakes with significant indigenous ecosystems.	Support	Not stated	Retain as notified
S261.212	12 Schedules	Schedule F2a: Significant habitats for indigenous birds in rivers.	Support	Not stated	Retain as notified
S261.213	12 Schedules	Schedule F2b: Significant habitats for indigenous birds in lakes.	Support	Not stated	Retain as notified
S261.214	12 Schedules	Schedule F2c: Significant habitats for indigenous birds in the coastal marine area.	Support	Not stated	Retain as notified
S261.215	12 Schedules	Schedule F4: Sites with significant	Support	Not stated	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		indigenous biodiversity values in the coastal marine area.			
S261.216	12 Schedules	Schedule F5: Habitats with significant indigenous biodiversity values in the coastal marine area.	Support	Not stated	Retain as notified
S261.217	12 Schedules	Schedule 27: Freshwater Action Plan requirements.	Support	Supports meeting NPSFM requirements	Retain as notified
S261.218	12 Schedules	A Freshwater Action Plans	Support	Supports meeting NPSFM requirements	Retain as notified
S261.219	12 Schedules	A1 Purpose	Support	Supports meeting NPSFM requirements	Retain as notified
S261.220	12 Schedules	A2 Freshwater Action Plans required in Whaitua Te	Amend	Considers actions plans are needed which address river/stream habitat and natural form and function to ensure degradation does not continue, to meet NPSFM responsibilities and requirements. Notes M39 states action plans will be prepared for nationally threatened freshwater species, and habitat extent and condition will be included. Seeks	Include "Habitat and natural form and character" under "Attributes for which Freshwater Action Plan will be prepared" for all part FMUs which are rivers / streams, being: Ōrongorongo, Te Awa Kairangi and Wainuiomata small forested and Te Awa Kairangi forested mainstems Te Awa Kairangi lower mainstem Te Awa Kairangi rural streams and rural mainstems

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Whanganui-a-Tara.		this is carried through to Schedule 27 by specifying habitat and natural form and character will form part of actions plans. Notes may rivers and streams are modified and degraded, and action plans with monitoring and interventions are required to ensure further habitat is not lost.	Te Awa Kairangi urban streams Waiwhetū Stream Wainuiomata urban streams Wainuiomata rural streams Parangarahu catchment streams and South-west coast rural streams Korokoro Stream Kaiwharawhara Stream Wellington urban Pouewe Takapū Taupō Te Rio o Porirua and Rangituhi Wai-O-Hata Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.221	12 Schedules	A3 Freshwater Action Plans required in Te Awarua-o-Porirua Whaitua.	Not Stated	Considers actions plans are needed which address river/stream habitat and natural form and function to ensure degradation does not continue, to meet NPSFM responsibilities and requirements. Notes M39 states action plans will be prepared for nationally threatened freshwater species, and habitat extent and condition will be included. Seeks this is carried through to Schedule 27 by specifying habitat and natural form and character will form part of actions plans. Notes may rivers and streams are modified and degraded, and action plans with monitoring and interventions are required to ensure further habitat is not lost.	Include "Habitat and natural form and character" under "Attributes for which Freshwater Action Plan will be prepared" for all part FMUs which are rivers / streams, being: Ōrongorongo, Te Awa Kairangi and Wainuiomata small forested and Te Awa Kairangi forested mainstems Te Awa Kairangi lower mainstem Te Awa Kairangi rural streams and rural mainstems Te Awa Kairangi urban streams Waiwhetū Stream Wainuiomata urban streams Wainuiomata rural streams Parangarahu catchment streams and South-west coast rural streams Korokoro Stream Kaiwharawhara Stream Wellington urban Pouewe Takapū Taupō Te Rio o Porirua and Rangituhi Wai-O-Hata

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.222	12 Schedules	B Freshwater Action Plan requirements.	Support	Supports meeting NPSFM requirements	Retain as notified
S261.223	12 Schedules	B1. Principles.	Not Stated	Supports meeting NPSFM requirements	Retain as notified
S261.224	12 Schedules	B2. General Content.	Not Stated	Supports meeting NPSFM requirements	Retain as notified
S261.225	12 Schedules	B3 Necessary actions.	Not Stated	Considers additional wording is required to ensure natural form and character and habitat values are protected and maintained.	Insert: **For the habitat and natural form and character attributes:** **(a) undertake a program to assess the state of habitat and natural form and character across the region, and** **(i) to monitor changes in habitat and natural form and character,** **(ii) to communicate changes through regular state of the environment reporting** **(b) review river management and flood protection plans to ensure habitat and natural form and character is maintained or improved through management actions** **(c) investigate options to strengthen consent conditions on activities which may affect habitat and natural form and character** Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.226	12 Schedules	C. Freshwater Action Plans in	Not Stated	Supports meeting NPSFM requirements	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Whaitua Te Whanganui-a-Tara			
S261.227	12 Schedules	D Freshwater Action Plans in Te Awarua-o-Porirua Whaitua	Not Stated	Supports meeting NPSFM requirements	Retain as notified
S261.228	12 Schedules	Schedule 28: Stormwater Contaminant Treatment.	Support	Supports achievement of ecosystem health	Not stated
S261.229	12 Schedules	Table 1: Target load Reductions for Copper and Zinc	Support	Not stated	Not stated
S261.230	12 Schedules	Schedule 30: Financial Contributions.	Oppose	Considers the methodology does not follow the effects management hierarchy and may facilitate adverse effects on aquatic species, deterioration of water quality and ecosystem health. Considers this is contrary to RMA s107, NZCPS and NPSFM.	Delete Schedule 30. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.231	12 Schedules	Table D1. Financial contribution calculations for residential	Oppose	Considers the provision inconsistent with the NPSFM.	Delete table Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		greenfield development			
S261.232	12 Schedules	Tale D2. Financial contribution calculations for non-residential greenfield development and new roads/state highways	Oppose	Considers the provision inconsistent with the NPSFM.	Delete table Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.233	12 Schedules	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Support	Supports giving effect to the NPSFM and management of sediment.	Not stated
S261.234	12 Schedules	A Purposes of the Erosion and Sediment Management Plan	Support	Supports giving effect to the NPSFM and management of sediment.	Not stated
S261.235	12 Schedules	B Management objectives	Support	Supports giving effect to the NPSFM and management of sediment.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S261.236	12 Schedules	C Requirements of the Erosion and Sediment Management Plan	Support	Supports giving effect to the NPSFM and management of sediment.	Not stated
S261.237	12 Schedules	C1 Contents of the Erosion and Sediment Management Plan	Support	Supports giving effect to the NPSFM and management of sediment.	Not stated
S261.238	12 Schedules	D Amendment of Erosion and Sediment Management Plan	Oppose	Considers GWRC should have jurisdiction to approve changes to management plans to ensure they still meet requirements to adequately manage sediment risk	Not stated
S261.239	12 Schedules	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	Support	Supports giving effect to the NPSFM and management of sediment.	Not stated
S261.240	12 Schedules	C2 Certification of the Erosion and	Not Stated	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Sediment Management Plan			
S261.241	12 Schedules	D Amendment of Erosion and Sediment Management Plan	Oppose	Considers GWRC should have jurisdiction to approve changes to management plans to ensure they still meet requirements to adequately manage sediment risk	Not stated
S261.242	12 Schedules	Schedule 35: Small farm registration.	Amend	Considers provision of fertiliser information is critical to ensure council is aware of pressures on catchment and can set appropriate limits on resource use, and complements reporting of stocking rates	Include requirement to report nitrogen fertiliser use. Retain balance of schedule. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.243	12 Schedules	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	Considers amendments are needed to ensure effects are managed.	Not stated
S261.244	12 Schedules	B Management objectives.	Amend	Considers amendments are needed to ensure effects are managed.	Define 'revegetation' so that it means 'woody vegetation' or 'indigenous woody vegetation'. Define 'not reasonably practicable' by setting out the circumstances or considerations that would make

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					revegetation 'not reasonably practicable'. If the 'not reasonably practicable' exemption is used, the certifier should assess the soil erosion control measures using an accepted methodology (not just estimating it). Include not increasing nitrogen loss risk above the baselines in C(1). Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.245	12 Schedules	C Content of a farm environment plan.	Amend	Considers councils need to collect information on inputs as pressures in catchments	Include requirements of annual reporting of stocking rates and fertiliser use. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.246	12 Schedules	D Risk assessment and mitigation to address risk.	Neutral	Not stated	Not stated
S261.247	12 Schedules	Table D1. Financial contribution calculations for residential greenfield development	Neutral	Not stated	Not stated
S261.248	12 Schedules	E Erosion Risk Treatment Plan.	Amend	Not stated	Include clear, enforceable goals. Provisions for critical source areas to apply across the farm and not only on high erosion risk land. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S261.249	12 Schedules	F Small stream riparian programme.	Amend	Considers setbacks are required to ensure waterbodies are protected from contaminants and to ensure flood flows do not wash away fencing. Considers additional requirements are needed to ensure effects are managed.	Amend to outline setback distance as a requirement, and to require revegetation of margins (with council support) Include clear, enforceable goals. Include criteria for how to assess risk of erosion, deposition and damage to the stream bed. Include criteria for when fencing is required, when it is not practicable, and how alternative measures to fencing to minimise stock access to water will be assessed. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.
S261.250	13 Maps	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4).	Support	Considers maps assist with plan interpretation.	Retain as notified.
S261.251	13 Maps	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 1: (Kāpiti).	Support	Considers maps assist with plan interpretation.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S261.252	13 Maps	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 2: (Wellington Harbour).	Support	Considers maps assist with plan interpretation.	Retain as notified.
S261.253	13 Maps	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 2: Te Awarua-o-Porirua.	Support	Considers maps assist with plan interpretation.	Retain as notified.
S261.254	13 Maps	Map 77: Habitats of nationally threatened freshwater species - Te Awarua-o-Porirua	Support	Considers maps assist with plan interpretation.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and Te Whanganui-a-Tara (Schedule F1).			
S261.255	13 Maps	Map 78: Part freshwater management units and target attribute state sites (rivers) - Te Awarua-o-Porirua.	Support	Considers maps assist with plan interpretation.	Retain as notified.
S261.256	13 Maps	Map 79: Part freshwater management units and target attribute state sites (rivers) - Te Whanganui-a-Tara.	Support	Considers maps assist with plan interpretation.	Retain as notified.
S261.257	13 Maps	Map 80: Part freshwater management units and target attribute state sites (lakes) -	Support	Considers maps assist with plan interpretation.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Te Whanganui-a-Tara.			
S261.258	13 Maps	Map 81: Rivers and catchment management units for water takes - Te Awarua-o-Porirua.	Support	Considers maps assist with plan interpretation.	Retain as notified.
S261.259	13 Maps	Map 82: Coastal water management units - Te Awarua-o-Porirua.	Support	Considers maps assist with plan interpretation.	Retain as notified.
S261.260	13 Maps	Map 83: Coastal water management units - Te Whanganui-a-Tara.	Support	Considers maps assist with plan interpretation.	Retain as notified.
S261.261	13 Maps	Map 84: Harbour arm catchments - Te Awarua-o-Porirua.	Support	Considers maps assist with plan interpretation.	Retain as notified.
S261.262	13 Maps	Map 85: Primary contact	Support	Considers maps assist with plan interpretation.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		sites - Te Whanganui-a-Tara.			
S261.263	13 Maps	Map 86: Unplanned greenfield areas - Porirua City Council.	Support	Considers maps assist with plan interpretation.	Retain as notified.
S261.264	13 Maps	Map 87: Unplanned greenfield areas - Wellington City Council.	Support	Considers maps assist with plan interpretation.	Retain as notified.
S261.265	13 Maps	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Support	Considers maps assist with plan interpretation.	Retain as notified.
S261.266	13 Maps	Map 89: Unplanned greenfield areas - Hutt City Council.	Support	Considers maps assist with plan interpretation.	Retain as notified.
S261.267	13 Maps	Map 90: Highest and high erosion risk land (Pasture) - Te	Support	Considers maps assist with plan interpretation.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Awarua-o-Porirua.			
S261.268	13 Maps	Map 91: Highest erosion risk land (Woody vegetation) - Te Awarua-o-Porirua.	Support	Considers maps assist with plan interpretation.	Retain as notified.
S261.269	13 Maps	Map 92: Highest erosion risk land (Plantation forestry) - Te Awarua-o-Porirua.	Support	Considers maps assist with plan interpretation.	Retain as notified.
S261.270	13 Maps	Map 93: Highest and high erosion risk land (Pasture) - Te Whanganui-a-Tara.	Support	Considers maps assist with plan interpretation.	Retain as notified.
S261.271	13 Maps	Map 94: Highest erosion risk land (Woody vegetation clearance) - Te	Support	Considers maps assist with plan interpretation.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Whanganui-a-Tara.			
S261.272	13 Maps	Map 95: Highest erosion risk land (Plantation forestry) - Te Whanganui-a-Tara.	Support	Considers maps assist with plan interpretation.	Retain as notified.
S261.273	13 Maps	Map 96: Mākara catchment.	Support	Considers maps assist with plan interpretation.	Retain as notified.
S261.274	13 Maps	Map 97: Mangaroa catchment.	Support	Considers maps assist with plan interpretation.	Retain as notified.

S111 Forest Enterprises

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S111.001	General comments	General comments - overall	Oppose	Supports submissions of China National Forestry Group, John Turkington Limited, NZ Farm Forestry Association and Juken New Zealand Limited	Not stated
S111.002	General comments	General comments - overall	Oppose	Considers Rules WH.R17 to WH.R22 and Rules P.R16 to P.R21 neglect to acknowledge the precedence of the National Environmental Standards of Plantation Forestry (NESPF) and National Environmental Standards of Commercial Forestry (NESCF). NESCF recognises need for flexibility to protect sensitive local environments and notes Regional	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				and District Councils can be more stringent or more lenient but needs to be based on assessments of science and encompasses all environmental, social, and economic factors including those already in place.	
S111.003	General comments	General comments - current legislation	Oppose	Considers where councils are proposing a new rule that is more stringent than the NES-PF, there is a requirement to demonstrate the more stringent rule is justified in the context of the region/district in accordance with section 32(4) of the RMA. Notes guidance is also included within the NES-PF Plan Alignment Guidance prepared by MPI. Notes more stringent rules under Regulation 6(1)(a) must firstly to demonstrate the NES-PF controls are not sufficient to achieve a plan objective that gives effect to the NPS-FM and then how a more stringent rule will achieve that objective in a more effective and efficient way than the NES-PF. Suggests roving a link between a proposed rule and a plan objective that gives effect to the NPS-FM is not sufficient. Notes section 32(4) of RMA also requires councils to demonstrate proposed rules (including rules being rolled over as part of a plan review) are justified in the context of the region/district.	Not stated
S111.004	General comments	General comments - rural	Oppose	Considers a lack of justification and definition for erosion prone land. Considers catchment management critical for positive environmental outcomes and cites supporting reports on catchment management. Notes in the LUC, classes six and seven are recommended for forestry as soil conservation is needed in comparison to arable cropping. Considers the erosion risk land maps, for pasture,	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				woody vegetation, and plantation forestry, ignore geology and other elements which provide land stability. States the Section 32 report part D page 110 defines erosion prone land as pre-existing slope of the land exceeding 20 degrees. Notes LUC defines slope of greater than 20 degrees as strongly rolling to hill country and as non-arable land, whereas a slope less than 20 degrees is arable and appropriate for cropping and intensive farming. Considers making afforestation or planting a prohibited activity on slope greater than 20 degrees, pastural farming will be encouraged on land which it is not suitable for (where grass has a much shallower root profile in comparison to plantation tree species) causing further erosion and sediment discharge. Considers forests are often located on land steeper than 20 degrees and are a productive land use on such sites, with adverse effects regulated by NESCF.	
S111.005	General comments	General comments – plantation forestry	Oppose	Considers GWRC have ignored statements made by Easton, Nation and Blyth. Considers technical memorandum does not consider land that is replanted back into plantation forestry., the stability that plantation forestry provides by its root structures, wind protection, wildlife habitat that is not found in pastural landscapes as well as rainfall uptake, all of which reduce erosion and landslides. Considers methodology used to identify landslide risk was over simplified and lacks local information. Considers geology and aspect was not accounted for. Considers the analysis and recommendations	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				unjustified. Expects PC1 to require sediment mitigations on identified erosion risk areas. Considers appropriate mitigation type and extent will vary depending on physical factors such as slope, aspect, site access and pest-control, and non-physical factors such as cost and landowner cooperation. Considers a site-specific assessment, which has same purpose as the required Harvest and Earthworks plans (schedule 4 & 6) of NESCF, provides more appropriate mitigation measures than the generalised PC1. Considers it unjustified to propose rules that impact land-disturbing activities if they were ignored. Considers intention of Easton, Nation and Blyth technical memorandum has been misused by GWRC as a forementioned, a site-specific field assessment and expert advice prevails.	
S111.006	General comments	General comments - plantation forestry	Oppose	Considers NES-CF has rules and controls for total suspended solids and plantation forestry discharge and seeks justification on how rules in PC1 provide greater positive environmental outcomes.	Not stated
S111.007	General comments	General comments - overall	Oppose	Considers NES-CF has rules and controls for the winter earthworks shutdown period and already manages effects. Considers a requirement for greater stringency has not been demonstrated.	Not stated
S111.008	General comments	General comments - plantation forestry	Oppose	Considers no recommendations from the Whaitua committees or the forestry industry have been implemented which reflect the proposed rules for plantation forestry. Notes as acknowledged in the Whaitua Committee reports, Regional Councils need to work with	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				forestry groups and contractors to provide support that includes ensuring all forestry operators are aware of relevant regulatory requirements and good practice. Considers lack of evidence that GWRC has engaged forestry groups. Considers Implementing new compliance roles does not achieve this recommendation.	
S111.009	General comments	General comments - overall	Oppose	Considers environmental outcomes Te-Awarua-o-Porirua and Te-Whanganui-a-Tara have recommended are not reflected by the proposed NRP rules. Considers oversimplifying slope and not factoring forestry activities, yet proposing rules on this basis, is scientifically and logically inconsistent. Considers whaitua recommendations consistent with the National Environmental Standards of Commercial Forestry and provides the site-specific assessments needed. Submitter invite GWRC to consult with forestry industry and evaluate level of stringency that NESCF already provides.	Not stated
S111.010	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity.	Oppose	Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated
S111.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest	Oppose	Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		erosion risk land - controlled activity.			
S111.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance - discretionary activity.	Oppose	Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated
S111.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Oppose	Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated
S111.014	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry - discretionary activity.	Oppose	Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated
S111.015	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.	Oppose	Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated
S111.016	9 Te Awarua-o-Porirua Whaitua	Rule P.R16: Vegetation clearance on highest erosion	Oppose	Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		risk land-permitted activity.			
S111.017	9 Te Awarua-o-Porirua Whaitua	Rule P.R17: Vegetation clearance on highest erosion risk land - controlled activity.	Oppose	Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated
S111.018	9 Te Awarua-o-Porirua Whaitua	Rule P.R18: Vegetation clearance - discretionary activity.	Oppose	Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated
S111.019	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry - controlled activity.	Oppose	Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated
S111.020	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry - discretionary activity.	Oppose	Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated
S111.021	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land -	Oppose	Rule does not acknowledge the precedence of the NESPF and NESCF.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		prohibited activity.			
S111.022	5.2 and 5.3 Discharges to land and water and land use rules	Rule R104: Vegetation clearance on erosion prone land - permitted activity.	Oppose	No reason specifically stated	Not stated
S111.023	5.2 and 5.3 Discharges to land and water and land use rules	Rule R107: Earthworks and vegetation clearance - discretionary activity.	Oppose	No reason specifically stated	Not stated

S107 Friends of Waipāhihi Karori Stream (F.O.W.K.S.)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S107.001	General comments	General comments - overall	Support	Supports the direction of PC1. Considers that strong implementation and enforcement of regulation is necessary to address aging infrastructure, inappropriate urban development and poor land use practices.	Not stated
S107.002	General comments	General comments - water quality improvements	Support	States that monitoring shows that water quality is poor in the Waipāhihi Karori Stream, particularly from E. coli. Considers that councils need to focus on basics, such as fixing pipes.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S107.003	General comments	General comments - target attribute states	Support	Particularly supports the following: - proposed timeframes for achieving the target attribute states. - proposed measures to reduce wet weather overflows and dry weather discharges from the wastewater system. Ideally prefers these are removed completely, however acknowledges the complexity of doing so.	Not stated
S107.004	General comments	General comments - stormwater management	Support	Supports all provisions which require development that increases impermeable surfaces to achieve neutral or lesser stormwater runoff compared to pre-development. Notes that stormwater retention is necessary to avoid flashy rainfall runoff.	Not stated
S107.005	General comments	General comments - target attribute states	Not Stated	Notes that Wellington City Council will submit that the timeframes for achieving the target attribute state be extended to 2060 but this is not supported by the submitter.	Not stated
S107.006	General comments	General comments - water quality improvements	Support	Considers the Waipāhihi Karori Stream and its community are likely to be most impacted by the timeline, though may not be a priority from a regional perspective. Concerned that they have been asking for these problems to be solved for decades; community wants to be able to safely use the stream and enjoy more abundant biodiversity.	Not stated
S107.007	General comments	General comments - target attribute states	Support	Opposes any extension of the proposed timeframe for achieving the target attribute states. Considers that the proposed timeframes would be strengthened by interim and measurable milestones (e.g. by 2030 and 2035), which would be essential should the timeframe be extended.	Not stated
S107.008	General comments	General comments - economic	Support	Considers the costs of inaction in the future outweighs the financial cost to implement PC1.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		cost/impact			
S107.009	General comments	General comments - overall	Not Stated	Considers councils need to prioritise better to focus on the basics and new sources of funding can be found with the right leadership.	Not stated
S107.010	General comments	General comments - overall	Support	Supports the Whaitua process and moves to implement the recommendations of Whaitua committee members and mana whenua.	Not stated
S107.011	6 Other methods	6.16 Freshwater Action Plan programme	Support	Supports the proposed Freshwater Action Plan programme. Seeks to be an active partner in the development of Freshwater Action Plans. Seeks more consistent and equitable resourcing for catchment groups.	Retain as notified

S284 Friends of Waiwhetū Stream

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S284.001	General comments	General comments - water quality improvements	Support	Supports PC1 and long-term view on water quality improvement. Supports use of specific targets for 2040 and 2100.	Not stated
S284.002	General comments	General comments - water bodies	Support	Concerns surrounding severe water quality of Waiwhetū Stream. Supports targets for reduced contamination, especially for E Coli. Supports the requirement of Territorial Authorities to repair/maintain wastewater pipes and detect and remediate leaks and cross contamination at properties. Supportive of finding alternative funding options for Councils for this work.	Not stated
S284.003	6 Other methods	6.16 Freshwater Action Plan programme	Support	Supports policies of Chapter 6.16 but concerned that proposed treatments to improve water quality are already known and the plans should be progressed more quickly than the timeframe of December 2026.	Bring forward the December 2026 timeframe

S043 Fulton Hogan Ltd

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S43.001	General comments	General comments - overall	Amend	Seeks consistency in definitions and plan provisions.	Not stated
S43.002	General comments	General comments - overall	Amend	Supports the improvement of water quality and ecosystem outcomes through PC1, but concerned some parts of PC1 go too far and do not provide	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				sufficient flexibility for day-to-day activities without resource consent.	
S43.003	2 Interpretation	Earthworks	Oppose	Opposes the use of different earthworks definitions in different parts of the region. Concern this will create confusion and be difficult to understand and implement.	~~For Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua only:~~ The alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, and disturbance of land for the installation of fence posts. Except that, for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20, 'earthworks' has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.~~For all other whaitua:~~ ~~The disturbance of a land surface from the time soil is first disturbed on a site until the time the site is stabilised.~~ ~~Earthworks includes blading, contouring, ripping, moving, removing, placing or replacing soil or earth, by excavation, or by cutting or filling operations, or by root raking.~~ ~~Earthworks do not include:~~ ~~(a) cultivation of the soil for the establishment of crops or pasture, and~~ ~~(b) the harvesting of crops, and~~ ~~(c) thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and~~ ~~(d) the construction, repair, upgrade or maintenance of:~~ ~~(i) pipelines, and~~ ~~(ii) electricity lines and their support structures, including the National Grid, and~~ ~~(iii) telecommunication structures or lines, and~~ ~~(iv) radio communication structures, and~~ ~~(v) firebreaks or fence lines, and~~ ~~(vi) a bore or geotechnical investigation bore, and~~ ~~(e) repair or maintenance of existing roads and tracks, and airfield runways, taxiways, and parking aprons for aircraft, and~~ ~~(f) maintenance of orchards and shelterbelts, and~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					~~(g) domestic gardening, and~~ ~~(h) repair, sealing or resealing of a road, footpath, driveway, and~~ ~~(i) discharge of cleanfill material to a cleanfill area~~
S43.004	2 Interpretation	Existing wastewater discharge	Oppose	Opposes the use of different definitions in different parts of the region. Concern this will create confusion and be difficult to understand and implement.	For Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua: Wastewater discharged into water or onto or into land in a manner that may enter surface water : (a) from a wastewater treatment plant that is already authorised by an existing resource consent at the time of application for a new resource consent (the replacement resource consent application may seek a different quality, and/or quantity, and/or discharge location within the same or a downstream waterbody), and/or (b) from a wastewater network catchment or sub-catchment that exists as of 30 October 2023 (date of notification). ~~For all other whaitua:~~ ~~Wastewater discharged into fresh or coastal water from a wastewater treatment plant or a wastewater network that is:~~ ~~(a) already authorised by an existing resource consent at the time of application for a new resource consent (the replacement resource consent application may seek a different quality, and/or quantity, and/or discharge location within the same or a downstream waterbody), and/or~~ ~~(b) from a heavy rainfall event overflow from a wastewater network that has occurred prior to 31 October 2020.~~
S43.005	5.4 Beds of lakes and rivers	Rule R133: Gravel extraction for flood protection purposes or erosion mitigation inside sites of significanc	Amend	Seeks to change the activity status from discretionary to restricted discretionary to recognise the benefits of gravel extraction for flood management.	Change the activity status to restricted discretionary

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		e - discretionary activity.			
S43.006	5.4 Beds of lakes and rivers	Rule R151A: Ongoing diversion of a river - permitted activity.	Support	Supports lawfully established activities as a permitted activity	Retain as notified
S43.007	8 Whaitua Te Whanganui-a-Tara	Objective WH.O2: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora.	Support	Supports the improvement of water quality by 2040, however suggests clause (b) could be clearer.	[...] (b) the hydrology of rivers and erosion processes, including bank stability are improved and sources of sediment are reduced ~~to a more natural level~~ **in comparison to the levels as at 1 November 2023,** and [...]
S43.008	8 Whaitua Te Whanganui-a-Tara	Policy WH.P6: Cumulative adverse	Oppose	Supports the improvement of water quality and the recognition of cumulative effects. However, considers cumulative effects difficult to manage and therefore seeks for the policy to allow for cumulative	Policy WH.P6: Cumulative adverse effects of point source discharges The cumulative adverse effects of point source discharges, excluding stormwater network and wastewater discharges,

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		effects of point source discharges .		effects to be managed as well as avoided. Also seeks for the recognition of sites that are already operating at "good management practice", and that requirements are to apply at the stage of re-consenting.	to water are avoided or minimised and: (a) any new discharge is inappropriate if contaminants in the discharge would cause the affected freshwater body to decline in relation to the target attribute state(s) for that part Freshwater Management Unit(s) and/or coastal water objective(s), and (b) all existing discharges in part Freshwater Management Uinits units or coastal water management units where the target attribute states and/or coastal water objectives are met are only appropriate if: (i) ~~at a minimum~~ **Unless the site is already operating at good management practice,** an application for a resource consent **includes, at a minimum,** a defined programme of work for upgrading the discharge, in accordance with good management practice, within the term of the resource consent, and (c) all **re-consenting of** existing discharges in part Freshwater Management Units or coastal water management units where the target attribute states and/or coastal water objectives are not met are only appropriate if: (i) the conditions on a resource consent require reduction of the adverse effects and improve the discharge at a level consistent with the degree of over allocation required to be reduced within that part Freshwater Management Unit and/or the coastal water management unit, and (ii) in determining the improvement to water quality required in (ii)(i), and the timeframe in which it is to be achieved, consideration will be given to the discharge's contribution to the target attribute state(s) for that part Freshwater Management Unit and/or coastal water objective not being met
S43.009	8 Whaitua Te Whanganui-a-Tara	Policy WH.P8: Avoiding discharges of specific products and waste.	Support	Seeks for washdown water from fresh concrete pours to be recognised in clause (a).	Policy WH.P8: Avoiding discharges of specific products and waste Avoid discharges to freshwater and coastal water, including where this is via the stormwater network, of: (a) chemical cleaning products, paint, solvents, fuels and coolant, oil, wet cement products **including wash water** and drill cooling water, or

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					(b) animal effluent from an animal effluent storage facility or from an area where animals are confined, or (c) untreated industrial or trade waste, or (d) untreated organic waste or leachate from storage of organic material.
S43.010	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Support	Considers that the avoidance of effects is not practicable, therefore seeks removal of "avoiding" adverse effects in clause (b).	Make a minor change to clause (b) to simplify the phrasing: (b) avoiding contaminants or hazardous substances being entrained in stormwater and discharged to a surface water body or coastal water, including via the stormwater network, or where avoidance is not practicable, implementing good management practice to ~~avoid or~~ minimise adverse effects on the environment, including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and...
S43.011	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Oppose	Concerned the broadness of the policy will discourage investment in water quality treatment. Considers the policy does not recognise different hardstand areas differ in contaminant loading. Considers financial contributions make more sense in developed catchments.	Reconsider the stormwater contribution approach.
S43.012	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Support	Supports the use of good management practice. Considers that the policy provides for the implementation of appropriate controls.	Retain as notified
S43.013	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down	Oppose	Considers the policy is onerous, and does not recognise that winter earthworks may be feasible depending on other factors (location, soil types, slope). Seeks for greater flexibility in the policy,	Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, **unless they can be staged or otherwise undertaken**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		of earthworks.		provided that activities are undertaken in accordance with the GWRC Erosion and Sediment Control Standard, and are managed and monitored.	**in a manner that avoids adverse effects on water quality,** and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).
S43.014	8 Whaitua Te Whanganui-a-Tara	Rule WH.R1: Point source discharges of specific contaminants - prohibited activity.	Oppose	Concerned the rule does not provide for situations where discharges of specific contaminants may be necessary due to there being no feasible alternatives, and can be treated to an acceptable level. Seeks greater flexibility in the rule to avoid perverse outcomes.	Rule WH.R1: Point source discharges of specific contaminants - prohibited activity The point source discharge of **more than incidental levels of:** (a) chemical cleaning products including vehicle cleaning products **and** detergents **unless these are biodegradable and non-ecotoxic,** bleach and disinfectant, or (b) paint and other substances used for the purpose of protecting surfaces (including stain and paint wash), or (c) solvents including paint stripper, or (d) liquid fuels, including diesel, petrol, oil, grease, except where these have been treated by an interceptor system to collect hazardous contaminants and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons, or (e) radiator coolant, or (f) cooking oil, or (g) **cement slurry, or cement wash** ~~cement slurry~~ and concrete cutting waste **unless these have been captured and treated to achieve a pH required by the water quality standards for the receiving waterbody,** or (h) drill cooling water into water or onto or into land, including via a stormwater network, where it may enter a surface water body or coastal water is a prohibited activity.
S43.015	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces -	Amend	Considers the rule does not recognise different hardstand areas differ in contaminant loading. Considers that financial contributions make more sense in developed catchments.	Delete clause (c)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		controlled activity.			
S43.016	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Oppose	Considers there are many instances where earthworks can be undertaken without adverse effects during winter months. Considers that small scale road maintenance projects would require resource consent due to being considered "earthworks", which would not be feasible to undertake during winter months or completely avoid sediment run-off. Considers the standard requiring no sediment discharge is unreasonable. Concerned with cost implications of resource consent being required for a large number of earthworks during winter months, regardless of their scale, and that environmental gains will be trivial.	Rule WH.R23: Earthworks - permitted activity Earthworks **and the associated discharge of sediment and/or flocculant** is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (i) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (ii) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (iii) the area of earthworks must be stabilised within six months after completion of the earthworks, and (iv) there is no discharge of sediment from earthworks and/or flocculant **from areas greater than 25 m2** into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (v) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.
S43.017	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Oppose	Considers there are many instances where earthworks can be undertaken without adverse effects during winter months. Considers that small scale road maintenance projects would require resource consent due to being considered "earthworks", which would not be feasible to undertake during winter months or completely avoid sediment run-off. Considers the rule is out of step	Rule WH.R24: Earthworks - restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				with Policy WH.P31 and is more stringent than the policy directs, noting that the rule applies to all earthworks regardless of scale. Concerned with cost implications of resource consent being required for a large number of earthworks during winter months, regardless of their scale, and that environmental gains will be trivial.	discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) **(i) earthworks with less than 3,000 m2 of disturbed area at any one time which intend to work between 1st June and 30th September in any year must prepare a site specific winter earthworks plan, which shall be provided to Greater Wellington Regional Council as part of this application for resource consent;** (ii) earthworks **which exceed 3,000 m2 of disturbed area at any one time** shall not occur between 1st June and 30th September in any year.
S43.018	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Oppose	Considers there are many instances where earthworks can be undertaken without adverse effects during winter months. Considers that small scale road maintenance projects would require resource consent due to being considered "earthworks", which would not be feasible to undertake during winter months or completely avoid sediment run-off. Considers the rule out of step with Policy WH.P31 and is more stringent than the policy directs. Concerned with cost implications of resource consent being required for a large number of earthworks during winter months, regardless of their scale, and that environmental gains will be trivial. Considers the non-complying activity status too restrictive given the number of activities that would be captured under Rule WH.R25.	Alter Rules WH.R23, WH.R24 and WH.R25 to provide for low level activities, rather than requiring a non-complying activity status consent for all earthworks between 1 June and 30 September where any run-off occurs. This could be provided alongside additional oversight and control of erosion and sediment control plans by Council so that Council has additional certainty over the measures and mitigation proposed.
S43.019	9 Te Awarua-	Objective P.O2: Te Awarua-o-	Support	Supports the improvement of water quality by 2040, however suggests clause (b) could be clearer.	[...] (b) erosion processes, including bank stability, are improved to significantly reduce the sedimentation rate in the harbour

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	Porirua's groundwater, rivers, lakes and natural wetlands, and their margins are on a trajectory of measurable improvement towards wai ora.			~~to a more natural level~~ **in comparison to the levels as at 1 November 2023,** and [...]
S43.020	9 Te Awarua-o-Porirua Whaitua	Policy P.P6: Point source discharges.	Oppose	Supports the improvement of water quality and the recognition of cumulative effects. However, considers cumulative effects difficult to manage and therefore seeks for the policy to allow for cumulative effects to be managed as well as avoided. Also seeks for the recognition of sites that are already operating at "good management practice", and that requirements are to apply at the stage of re-consenting.	Policy WH.P6: Cumulative adverse effects of point source discharges The cumulative adverse effects of point source discharges, excluding stormwater network and wastewater discharges, to water are avoided **or minimised** and: (a) any new discharge is inappropriate if contaminants in the discharge would cause the affected freshwater body to decline in relation to the target attribute state(s) for that part Freshwater Management Unit(s) and/or coastal water objective(s), and (b) all existing discharges in part Freshwater Management Units or coastal water management units where the target attribute states and/or coastal water objectives are met are only appropriate if: (i) ~~at a minimum~~ **Unless the site is already operating at good management practice,** an application for a resource consent includes, at a minimum, a defined programme of work for upgrading the discharge, in accordance with good management practice, within the term of the resource consent, and (c) all **re-consenting of** existing discharges in part

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					Freshwater Management Units or coastal water management units where the target attribute states and/or coastal water objectives are not met are only appropriate if: (i) the conditions on a resource consent require reduction of the adverse effects and improve the discharge at a level consistent with the degree of over allocation required to be reduced within that part Freshwater Management Unit and/or the coastal water management unit, and (ii) in determining the improvement to water quality required in (i), and the timeframe in which it is to be achieved, consideration will be given to the discharge's contribution to the target attribute state(s) for that part Freshwater Management Unit and/or coastal water objective not being met
S43.021	9 Te Awarua-o-Porirua Whaitua	Policy P.P8 Avoiding discharges of specific products and waste.	Support	Seeks for washdown water from fresh concrete pours to be recognised in clause (a).	Policy P.P8: Avoiding discharges of specific products and waste Avoid discharges to freshwater and coastal water, including where this is via the stormwater network, of: (a) chemical cleaning products, paint, solvents, fuels and coolant, oil, wet cement products **including wash water** and drill cooling water, or (b) animal effluent from an animal effluent storage facility or from an area where animals are confined, or (c) untreated industrial or trade waste, or (d) untreated organic waste or leachate from storage of organic material.
S43.022	9 Te Awarua-o-Porirua Whaitua	Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises.	Support	Considers the avoidance of effects is not practicable, therefore seeks the removal of "avoiding" adverse effects in clause (b).	(b) avoiding contaminants or hazardous substances being entrained in stormwater and discharged to a surface water body or coastal water, including via the stormwater network, or where avoidance is not practicable, implementing good management practice to ~~avoid or~~ minimise adverse effects on the environment, including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and...

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S43.023	9 Te Awarua-o-Porirua Whaitua	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Oppose	Concerned the broadness of the policy will discourage investment in water quality treatment. Considers the policy does not recognise different hardstand areas differ in contaminant loading. Considers that financial contributions make more sense in developed catchments.	Reconsider the stormwater contribution approach.
S43.024	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Support	Supports the use of good management practice. Considers that the policy provides for the implementation of appropriate controls.	Retain as notified
S43.025	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Oppose	Considers the policy is onerous, and does not recognise that winter earthworks may be feasible depending on other factors (location, soil types, slope). Seeks for greater flexibility in the policy, provided that activities are undertaken in accordance with the GWRC Erosion and Sediment Control Standard, and are managed and monitored.	Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, **unless they can be staged or otherwise undertaken in a manner that avoids adverse effects on water quality,** and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).
S43.026	9 Te Awarua-o-Porirua Whaitua	Rule P.R1: Point source discharges of specific contaminants - prohibited activity.	Oppose	Concerned the rule does not provide for situations where discharges of specific contaminants may be necessary due to there being no feasible alternatives, and can be treated to an acceptable level. Seeks greater flexibility in the rule.	Rule P.R1: Point source discharges of specific contaminants - prohibited activity The point source discharge of **more than incidental levels of:** (a) chemical cleaning products including vehicle cleaning products **and** detergents **unless these are biodegradable and non-ecotoxic,** bleach and disinfectant, or (b) paint and other substances used for the purpose of protecting surfaces (including stain and paint wash), or

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					(c) solvents including paint stripper, or (d) liquid fuels, including diesel, petrol, oil, grease, except where these have been treated by an interceptor system to collect hazardous contaminants and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons, or (e) radiator coolant, or (f) cooking oil, or (g) **cement slurry,** or cement wash ~~cement slurry and concrete cutting waste~~ **unless these have been captured and treated to achieve a pH required by the water quality standards for the receiving waterbody,** or (h) drill cooling water into water or onto or into land, including via a stormwater network, where it may enter a surface water body or coastal water is a prohibited activity.
S43.027	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Refers to submitter's own comments on Policy P.P15. Opposes requirements for financial contributions.	Remove clause c of Rule P.R6.
S43.028	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Oppose	Considers there are many instances where earthworks can be undertaken without adverse effects during winter months. Considers that small scale road maintenance projects would require resource consent due to being considered "earthworks", which would not be feasible to undertake during winter months or completely avoid sediment run-off. Considers the standard requiring no sediment discharge is unreasonable. Concerned with cost implications of resource consent being required for a large number of earthworks during winter months, regardless of their scale, and that environmental gains will be trivial.	Rule P.R22: Earthworks - permitted activity Earthworks **and the associated discharge of sediment and/or flocculant** is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (i) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (ii) soil or debris from earthworks is not placed where it

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					can enter a surface water body or the coastal marine area, including via a stormwater network, and (iii) the area of earthworks must be stabilised within six months after completion of the earthworks, and (iv) there is no discharge of sediment from earthworks and/or flocculant **from areas greater than 25 m2** into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (v) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.
S43.029	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Oppose	Considers there are many instances where earthworks can be undertaken without adverse effects during winter months. Considers that small scale road maintenance projects would require resource consent due to being considered "earthworks", which would not be feasible to undertake during winter months or completely avoid sediment run-off. Considers the rule is out of step with Policy P.28 and is more stringent than the policy directs, noting that the rule applies to all earthworks regardless of scale. Concerned with cost implications of resource consent being required for a large number of earthworks during winter months, regardless of their scale, and that environmental gains will be trivial.	Rule WH.R24: Earthworks - restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b)**(i) earthworks with less than 3,000 m2 of disturbed area at any one time which intend to work between 1st June and 30th September in any year must prepare a site specific winter earthworks plan, which shall be provided to Greater Wellington Regional Council as part of this application for resource consent;** (ii) earthworks **which exceed 3,000 m2 of disturbed area**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					at any one time shall not occur between 1st June and 30th September in any year.
S43.030	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks - non-complying activity.	Oppose	Considers there are many instances where earthworks can be undertaken without adverse effects during winter months. Considers that small scale road maintenance projects would require resource consent due to being considered "earthworks", which would not be feasible to undertake during winter months or completely avoid sediment run-off. Considers the rule out of step with Policy P.28 and is more stringent than the policy directs. Concerned with cost implications of resource consent being required for a large number of earthworks during winter months, regardless of their scale, and that environmental gains will be trivial. Considers the non-complying activity status too restrictive given the number of activities that would be captured under Rule P.R25.	Alter Rules P.R22, P.R23 and P.R24 to provide for low level activities, rather than requiring a non-complying activity status consent for all earthworks between 1 June and 30 September where any run-off occurs. This could be provided alongside additional oversight and control of erosion and sediment control plans by Council so that Council has additional certainty over the measures and mitigation proposed.

S221 Generation Zero

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S221.001	General comments	General comments - overall	Not Stated	Considers the current quality of water disproportionately affects Ngāti Toa physical health and jeopardizes the cultural practices and mātauranga that reinforce them. Considers this also impacts mana whenua across the Wellington region. Considers collecting kai moana from the harbour is a standard indicator of waterway health in the catchments.	Not stated
S221.002	General comments	General comments - water bodies	Not Stated	Support recommendations for improving the health and well-being of coastal waterbodies towards Te Mana o te Wai in Waituata Te Whanganui-a-tara. C. Suggests sections such as 4.6 on Biodiversity, where "maintain or where practicable restore" is used, could focus on improvement as well as	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				restoration. Suggests goal for policy should not be maintenance but improvement and should align better with principles of stewardship and Kaitiakitanga inherent to Te Mana o te Wai.	
S221.003	General comments	General comments - water bodies	Support	Support emphasis on coastal receiving environment and considers this aligns with the set objectives of holistic water health approach and with te ara Wairua o te Wai values.	Not stated
S221.004	General comments	General comments - target attribute states	Amend	Endorses the TAS objective of Option 1 (achieving goals by 2040) because it will incentivise greater innovation. Suggest interim targets to make the timeframe less divisive.	Not stated
S221.005	General comments	General comments - wastewater	Amend	Notes there is no quantified analysis of social and cultural benefits from wastewater improvements and no monetary cost assessment of not improving wastewater systems over the next 40 years. Concern that wastewater will need to be resilient to factor changes such as projected population growth, increased extreme rainfall, and sea level rise. Suggests that resilient long-term infrastructure will provide risk reduction as well as social and cultural benefits.	Not stated
S221.006	General comments	General comments - water quality improvements	Not Stated	Concerns surrounding the release of untreated wastewater into coastal areas, harbours and freshwater rivers as it is both detrimental to the health of the community and contributes to environmental degradation.	Not stated
S221.007	General comments	General comments - water quality improvements	Support	Concerns for the number of Part FMU's where copper and zinc baselines are D and C. Supports the recommendations of Te Awarua-o-Porirua WIP. Supports Policy Package Option 1 as choice of action.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S221.008	General comments	General comments - urban development	Amend	Supports infill housing and brownfield redevelopment preference. Supports upzoning both for environmentally friendly housing shortage needs but also the cost efficiency of improving stormwater in existing urban areas vs in greenfield areas. Considers the need for redevelopment of existing urban areas to accommodate urban intensification without stormwater degradation of surrounding waterways. Supports Policy Package Option 1 and 3 but not 2.	Not stated
S221.009	General comments	General comments - consultation	Not Stated	Suggests a collaborative approach with affected community members to promote social cohesion and minimise backlash to economic costs of improving infrastructure. Suggests simplified guides to RPS changes so submissions are accessible to the community.	Not stated
S221.010	2 Interpretation	Coastal water management units	Support	Not Stated	Not stated
S221.011	4 Policies	4.6 Biodiversity, aquatic ecosystem health and mahinga kai.	Not Stated	Suggests sections such as 4.6 on Biodiversity, where "maintain or where practicable restore" is used, could focus on improvement as well as restoration Considers the current wording presents restoration as optional. Suggests goal for policy should not be maintenance but improvement and should align better with principles of stewardship and Kaitiakitanga inherent to Te Mana o te Wai.	Not Stated

S161 GILLIES GROUP MANAGEMENT LTD

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S161.001	General comments	General comments - overall	Oppose	Opposes the entirety of PC1	1. Withdrawal of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					management and earthworks); OR 2. Should the relief sought in point 1) not occur, the Submitter seeks the relief set out in their submission; AND 3. Any other relief (including consequential relief) to give effect to the decisions sought as part of the submission
S161.002	General comments	General comments - overall	Oppose	Notes several drafting errors which create unintended consequences for housing and land development because the provisions have immediate legal effect.	Not stated
S161.003	General comments	General comments - urban development	Oppose	Considers implications of PC1 on affordability of housing and land development will be significant and are not appropriately addressed. Considers financial contributions for new residential units will have cascading effects on housing affordability and new requirements are inconsistent with provisions relating to housing affordability in the NPS-UD, and are not addressed in the s32 report. Opposes Schedule 30 and associated provisions and considers the financial contribution requirements burdensome and will adversely affect housing availability and affordability. Considers PC1 and its supporting documentation does not assess impacts on landowners and developers. Notes potential impacts on the commercial viability of the private sector and considers a mandatory flat fee financial contribution may incentivise large lots over intensification, which is inconsistent with Objective 2 and associated policies of the NPS-UD, and is not addressed in the s32 report. Considers the policy relies on financial contributions without consideration for alternatives or acknowledgement of changes in land use that may improve water quality, highlighting limitations due to stormwater contaminant treatment only being practicable for a portion of the contaminant load.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Highlights lack of clarity on the feasibility, effectiveness and timing of mechanisms outlined in the schedule. Opposes clarification from GWRC that financial contributions will be required for developments achieving reductions greater than 85%. Considers the proposed contributions are not effects-based.	
S161.004	General comments	General comments - urban development	Oppose	Opposes non-complying activity status for winter earthworks. Considers current approach to managing winter earthworks is effective. Considers that a blanket non-complying activity status does not take into account the scale, nature or duration of works. Considers the requirement to stabilise earthworks and implement sediment controls prior to shut down may not be feasible resulting in unintended environmental outcomes. Concerned the prescribed shut down period may not align with specific site conditions. Considers blanket restrictions do not effectively address the diversity of different sites and applicants which demonstrate the required management of winter works should be supported to avoid delays of housing supply.	Not stated
S161.005	General comments	General comments - unplanned greenfield development	Oppose	Opposes new provisions relating to unplanned development, and that they deny a consenting pathway for proposals that may have positive outcomes for the community or for freshwater. Notes the s32 evaluation suggest that contaminants can be addressed through a combination of treatment and financial contributions, therefore considers prohibited activity status inappropriate. Considers the need for two plan changes to enable greenfield development poses challenges for the private sector's responsiveness to housing needs, and is onerous and costly. Considers the approach may jeopardise the economic viability of development and hinder the supply of affordable housing.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S161.006	General comments	General comments - stormwater management	Oppose	Considers there is insufficient detail on the types of hydrological controls and WSUD are required for various types and scales of development. Considers the standards pose significant burdens on property owners and developers. Considers that engineering advice should not be necessary for the creation of small impervious areas, noting a permitted activity rule for 30m2 of impervious areas. Considers PC1 does not adequately evaluate financial costs on landowners, developers and ratepayers, including flow-on costs on the commercial viability of housing supply and affordability.	Not stated
S161.007	2 Interpretation	Hydrological control	Amend	Considers the definition will not assist in the interpretation of provisions as it does not outline actual controls. Notes the definition of "stormwater treatment system" provides examples as well as specifications in Schedule 28.	Amend definition to outline what hydrological controls are, including examples and a schedule with technical standards.
S161.008	2 Interpretation	Impervious surfaces	Amend	Considers a roof with rainwater collection should be not be considered an impervious surface where it complies with hydraulic neutrality rules. Considers the implementation of greywater reuse is not a regulatory requirement and will significantly add to development costs.	Amend definition as follows and make any other consequential relief necessary to give effect to this submission point: Surfaces that prevent or significantly impede the infiltration of stormwater into soil or the ground, includes: roofs paved areas (including sealed/compacted metal) such as roads, driveways, parking areas, sidewalks/foot paths or patios, and excludes: grassed areas, gardens and other vegetated areas porous or permeable paving slatted decks which allow water to drain through to a permeable surface porous or permeable paving and living roofs roof areas with rainwater collection ~~and reuse~~ ~~any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)~~
S161.009	2 Interpretation	Redevelopment	Amend	Seeks for the definition to exclude extensions to existing buildings, to allow a permitted baseline for small redevelopment of existing sites.	Amend definition as follows and make any other consequential relief necessary to give effect to this submission point:

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					For the purpose of assessment of a proposal involving the redevelopment of an existing urbanised property (i.e. including brownfield development upgrades to existing roads etc.) in relation to stormwater effects. this includes the replacement, reconstruction or addition (new) of impervious surfaces. Excludes: minor maintenance or repairs to roads, carparking areas, driveways and paving installation, maintenance or repair of underground infrastructure or network utilities requiring trenching and resurfacing activities that only involve the re-roofing of existing buildings **extensions to existing buildings**
S161.010	2 Interpretation	Unplanned greenfield development	Oppose	Notes the definition relates to associated prohibited activity rules that are opposed.	Delete definition
S161.011	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	Opposes provisions for unplanned greenfield growth as the prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. Notes that the s32 report states that all contaminants can be mitigated through treatment and financial contributions, and considers that prohibited activity status is inappropriate in this case. Further considers the prohibited activity status inconsistent with Policy 8 of the NPS-UD. Notes that the s32 report sets out the prohibited activity status to require both a regional and district plan change to enable greenfield development. Considers the need for two plan changes will be expensive and will make it difficult for market responsiveness to the provision of housing.	Amend policy as follows and make any other consequential relief necessary to give effect to this submission point: Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (a) ~~prohibiting unplanned greenfielddevelopment 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 (b)encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c)imposing hydrological controls on urban development and stormwater discharges to rivers, and (d) requiring a reduction in contaminant loads from urban

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.
S161.012	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	Amend	Considers there is insufficient detail on the types of hydrological controls and WSUD are required for various types and scales of development. Considers that clauses (a), (b) and (c) may pose significant burdens on property owners and developers. Considers that communal stormwater treatment may not be practical in all scenarios. Considers that engineering advice should not be necessary for the creation of small impervious areas, noting a permitted activity rule for 30m2 of impervious areas. Considers the s32 report does not adequately assesses the costs of PC1 on landowners and developers, nor the broader impacts on urban growth and housing supply.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.
S161.013	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Oppose	Opposes the proposed financial contributions framework. Recognises the importance of managing stormwater contaminants, however considers financial contribution requirements burdensome, hindering greenfield development, housing availability and affordability. Considers costs to landowners/developers are not assessed, including flow-on impacts on housing supply and affordability, and consequential effects on commercial viability to provide for urban growth. Considers a mandatory flat fee financial contribution may incentivise large lots over intensification. Considers the policy relies on financial contributions without consideration for	Delete policy

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				alternatives or acknowledgement of changes in land use that may improve water quality, highlighting limitations due to stormwater contaminant treatment only being practicable for a portion of the contaminant load. Highlights lack of clarity on the feasibility, effectiveness and timing of mechanisms outlined in the schedule. Opposes clarification from GWRC that financial contributions will be required for developments achieving reductions greater than 85%. Considers the proposed contributions are not effects-based.	
S161.014	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Oppose	Opposes the avoidance/prohibited approach to greenfield development. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. Considers the prohibited activity status is inconsistent with the NPS-UD.	Delete policy
S161.015	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose	Opposes non-complying activity status for winter earthworks. Notes that large storm events can occur throughout the year, resulting in large sediment discharges. Considers that existing management of winter earthworks should be retained, through a separate approval process against established criteria, with oversight from compliance officers. Notes that current practice enables consideration of the track record of works completed before winter. Considers that a blanket non-complying activity status does not take into account the scale, nature or duration of works. Considers the requirement to stabilise earthworks and implement sediment controls prior to shut down is not feasible in all situations, resulting in perverse environmental outcomes. Concerned the prescribed shut down period may not align with specific site conditions.	Delete policy

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers blanket restrictions do not effectively address the diversity of different sites. Considers that applicants which demonstrate the required management of winter works should be supported to avoid delays of housing supply.	
S161.016	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Amend	Considers the rule requires new connections to the stormwater network to obtain regional resource consent, whereas new connections to discharge to the network are controlled by territorial authorities.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule WH.R2: Stormwater to land - permitted activity The discharge of stormwater onto or into land, including where contaminants may enter groundwater: (a) that is not from a high risk industrial or trade premise, or (b) **that is not connected to** ~~that does not discharge from, or to,~~ a local authority stormwater network, is a permitted activity provided the following conditions are met: (...)
S161.017	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Amend	Considers the rule requires new connections to the stormwater network to obtain regional resource consent, whereas new connections to discharge to the network are controlled by territorial authorities.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity The discharge of stormwater from an existing individual property into water, or onto or into land where it may enter a surface water body or coastal water, (a) that is not from a high risk industrial or trade premise, or (b) that is not from a port, airport or state highway, or (c) **that is not connected to** ~~does not discharge from, or to,~~ a local authority stormwater network, is a permitted activity, provided the following conditions are met: (...)
S161.018	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces -	Amend	Considers there is insufficient detail on the types of hydrological controls and WSUD are required for various types and scales of development. Considers the conditions may pose significant burdens on property owners and developers. Considers that engineering advice should not be necessary for the creation of small impervious areas, noting a permitted activity rule for 30m2 of impervious areas. Considers that costs to landowners, developers, ratepayers are not assessed, including flow-on	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.		costs on commercial viability of housing supply and affordability.	
S161.019	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Considers there is insufficient detail on the types of hydrological controls and WSUD are required for various types and scales of development. Considers the conditions may pose significant burdens on property owners and developers. Considers that engineering advice should not be necessary for the creation of small impervious areas, noting a permitted activity rule for 30m2 of impervious areas. Considers that costs to landowners, developers, ratepayers are not assessed, including flow-on costs on commercial viability of housing supply and affordability.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.
S161.020	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Amend	Considers there is insufficient detail on the types of hydrological controls and WSUD are required for various types and scales of development. Considers the conditions may pose significant burdens on property owners and developers. Considers that engineering advice should not be necessary for the creation of small impervious areas, noting a permitted activity rule for 30m2 of impervious areas. Considers that costs to landowners, developers, ratepayers are not assessed, including flow-on costs on commercial viability of housing supply and affordability.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.
S161.021	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces -	Amend	Opposes financial contributions for residual stormwater contaminants. Considers the proposed financial contributions framework does not recognise that greenfield developments may improve contaminant discharges. Considers the imposition of financial contributions as outlined in Schedule 30 places burden on developers and may hinder greenfield development and further exacerbate commercial viability of affordable housing supply.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discretionary activity.			water, including through an existing local authority stormwater network, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or Rule WH.R7, or prohibited under WH.R13 is a discretionary activity provided the following conditions are met: (a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), ~~and~~ ~~(b) if the proposal is for greenfield development a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions).~~
S161.022	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Amend	Opposes the avoidance/prohibited approach to greenfield development. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. Considers the prohibited activity status is inconsistent with the NPS-UD.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule WH.R12: All other stormwater discharges - non-complying activity The: (a) discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule WH.R2, or (b) discharge of stormwater into water or onto or into land where it may enter a surface water body or coastal water, that is not permitted by Rule WH.R3, or a restricted discretionary activity under Rules WH.R8 or WH.R9, or (c) discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule WH.R4, or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade premise that does not meet the conditions of Rule WH.R11, or (d) use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater into water or onto or into land where it may enter water, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or WH.R7, or a discretionary activity under Rule WH.R10 or WH.R11, ~~or a prohibited~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					~~activity under WH.R13,~~ is a non-complying activity.
S161.023	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Opposes the avoidance/prohibited approach to greenfield development. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. Considers the prohibited activity status is inconsistent with the NPS-UD.	Delete rule
S161.024	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	Considers the "and" after clause (b) means earthworks not on a farm require consent and is unlikely the intent of the rule.	Rule WH.R23: Earthworks - permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, ~~and~~ **or** (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note

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					Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).
S161.025	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	Opposes non-complying activity status for winter earthworks. Notes that large storm events can occur throughout the year, resulting in large sediment discharges. Considers current approach to managing winter earthworks is effective. Considers that a blanket non-complying activity status does not take into account the scale, nature or duration of works. Considers the requirement to stabilise earthworks and implement sediment controls prior to shut down may not be feasible resulting in unintended environmental outcomes. Concerned the prescribed shut down period may not align with specific site conditions. Considers blanket restrictions do not effectively address the diversity of different sites and applicants which demonstrate the required management of winter works should be supported to avoid delays of housing supply.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule WH.R24: Earthworks - restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and ~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~
S161.026	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	Opposes provisions for unplanned greenfield growth. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. Notes that the s32 report states that all contaminants can be mitigated through treatment and financial contributions, and considers that prohibited activity status is inappropriate. 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	Amend policy as follows and make any other consequential relief necessary to give effect to this submission point: Policy P.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (a) ~~prohibiting unplanned greenfield development and for other greenfield developments~~ minimising ~~the~~ contaminants **from greenfield developments** ~~and requiring financial~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				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.	~~contributions as to offset adverse effects from residual stormwater contaminants,~~ and (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers, and (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.
S161.027	9 Te Awarua-o-Porirua Whaitua	Policy P.P10: Managing adverse effects of stormwater discharges.	Amend	Considers there is insufficient detail on the types of hydrological controls and WSUD are required for various types and scales of development. Considers the conditions pose significant burdens on property owners and developers. Considers that engineering advice should not be necessary for the creation of small impervious areas, noting a permitted activity rule for 30m2 of impervious areas.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.
S161.028	9 Te Awarua-o-Porirua Whaitua	Policy P.P14: Stormwater contaminant offsetting for new greenfield	Oppose	Opposes financial contributions for residual stormwater contaminants. Considers the proposed policy and financial contributions framework does not recognise that greenfield developments may improve contaminant discharges. Considers the imposition of financial contributions as outlined in Schedule 30 places burden on developers and may hinder greenfield development and further exacerbate commercial viability of affordable housing supply.	Delete policy

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		development.			
S161.029	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Oppose	Opposes the avoidance/prohibited approach to greenfield development. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. Considers the prohibited activity status is inconsistent with the NPS-UD.	Delete policy
S161.030	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose	Opposes non-complying activity status for winter earthworks. Notes that large storm events can occur throughout the year, resulting in large sediment discharges. Considers current approach to managing winter earthworks is effective. Considers that a blanket non-complying activity status does not take into account the scale, nature or duration of works. Considers the requirement to stabilise earthworks and implement sediment controls prior to shut down may not be feasible resulting in unintended environmental outcomes. Concerned the prescribed shut down period may not align with specific site conditions. Considers blanket restrictions do not effectively address the diversity of different sites and applicants which demonstrate the required management of winter works should be supported to avoid delays of housing supply.	Delete policy
S161.031	9 Te Awarua-o-Porirua Whaitua	Rule P.R2: Stormwater to land - permitted activity.	Amend	Considers the rule requires new connections to the stormwater network to obtain regional resource consent, whereas new connections to discharge to the network are controlled by territorial authorities.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule P.R2: Stormwater to land - permitted activity The discharge of stormwater onto or into land, including where contaminants may enter groundwater (a) that is not from a high risk industrial or trade premise, or (b) **that is not connected to** ~~that does not discharge from, or to,~~ a local authority stormwater network

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					is a permitted activity provided the following conditions are met: (...)
S161.032	9 Te Awarua-o-Porirua Whaitua	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Amend	Considers the rule requires new connections to the stormwater network to obtain regional resource consent, whereas new connections to discharge to the network are controlled by territorial authorities.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity The discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, from an existing individual property (a) that is not from a high risk industrial or trade premise, or (b) that is not from a state highway, or (c) **that is not connected to** ~~that does not discharge from, or to,~~ a local authority stormwater network is a permitted activity provided the following conditions are met: (...)
S161.033	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Considers there is insufficient detail on the types of hydrological controls and WSUD are required for various types and scales of development. Considers the conditions pose significant burdens on property owners and developers. Considers that engineering advice should not be necessary for the creation of small impervious areas, noting a permitted activity rule for 30m2 of impervious areas.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.
S161.034	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Considers there is insufficient detail on the types of hydrological controls and WSUD are required for various types and scales of development. Considers the conditions pose significant burdens on property owners and developers.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.
S161.035	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and	Amend	Considers there is insufficient detail on the types of hydrological controls and WSUD are required for various types and scales of development. Considers the conditions pose significant burdens on property	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		redeveloped impervious surfaces of existing urbanised areas-controlled activity.		owners and developers. Considers that engineering advice should not be necessary for the creation of small impervious areas, noting a permitted activity rule for 30m2 of impervious areas.	
S161.036	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Amend	Opposes financial contributions for residual stormwater contaminants. Considers the proposed financial contributions framework does not recognise that greenfield developments may improve contaminant discharges. Considers the imposition of financial contributions as outlined in Schedule 30 places burden on developers and may hinder greenfield development and further exacerbate commercial viability of affordable housing supply. Considers the feasibility, effectiveness and timing of catchment scale stormwater treatment systems that collected funds will be used for is unclear.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule P.R10: Stormwater from new and redeveloped impervious surfaces - discretionary activity The use of land for the creation of new or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including via an existing local authority stormwater network, that is not permitted by Rule P.R5, or a controlled activity under Rule P.R6 or Rule P.R7, or prohibited under P.R12 is a discretionary activity provided the following conditions are met: (a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), and ~~(b) if the proposal is for greenfield development, a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions).~~
S161.037	9 Te Awarua-o-Porirua Whaitua	Rule P.R11: All other stormwater discharges	Amend	Opposes the avoidance/prohibited approach to greenfield development. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule P.R11: All other stormwater discharges - non-complying activity The: (a) discharge of stormwater onto or into land, including

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		- non-complying activity.		freshwater. Considers the prohibited activity status is inconsistent with the NPS-UD.	where contaminants may enter groundwater, that is not permitted by Rule P.R2, or (b) discharge of stormwater into water or onto or into land where it may enter water, that is not permitted by Rule P.R3, or a restricted discretionary activity under Rule P.R8, or (c) discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule P.R4, or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade premise that does not meet the conditions of Rule P.R10, or (d) use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater water or onto or into land where it may enter water, that is not permitted by Rule P.R5, or a controlled activity under Rules P.R6 or P.R7, or a discretionary activity under Rule P.R9, ~~or a prohibited activity under Rule P.R12,~~ is a non-complying activity.
S161.038	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Oppose	Opposes the avoidance/prohibited approach to greenfield development. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. Considers the prohibited activity status is inconsistent with the NPS-UD.	Delete rule
S161.039	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Amend	Considers the "and" after clause (b) means earthworks not on a farm require consent and is unlikely the intent of the rule.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule P.R22: Earthworks - permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					(b) the earthworks are to implement an action in the farm environment plan for the farm, ~~and~~ **or** (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).
S161.040	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Amend	Opposes non-complying activity status for winter earthworks. Notes that large storm events can occur throughout the year, resulting in large sediment discharges. Considers current approach to managing winter earthworks is effective. Considers that a blanket non-complying activity status does not take into account the scale, nature or duration of works. Considers the requirement to stabilise earthworks and implement sediment controls prior to shut down may not be feasible resulting in unintended environmental outcomes. Concerned the prescribed shut down period may not align with specific site conditions. Considers blanket	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule P.R23: Earthworks - restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				restrictions do not effectively address the diversity of different sites and applicants which demonstrate the required management of winter works should be supported to avoid delays of housing supply.	of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and ~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~
S161.041	12 Schedules	Schedule 30: Financial Contributions.	Oppose	Opposes the proposed financial contributions framework. Recognises the importance of managing stormwater contaminants, however considers financial contribution requirements burdensome, hindering greenfield development and housing availability. Considers the policy relies on financial contributions without consideration for alternatives or acknowledgement of changes in land use that may improve water quality, highlighting limitations due to stormwater contaminant treatment only being practicable for a portion of the contaminant load. Highlights lack of clarity on the feasibility, effectiveness and timing of mechanisms outlined in the schedule. Opposes clarification from GWRC that financial contributions will be required for developments achieving reductions greater than 85%. Considers the proposed contributions are not effects-based.	Delete Schedule 30.
S161.042	13 Maps	Map 86: Unplanned greenfield areas - Porirua City Council.	Oppose	Opposes the avoidance/prohibited approach to greenfield development. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. Considers the prohibited activity status is inconsistent with the NPS-UD.	Delete map.
S161.043	13 Maps	Map 87: Unplanned greenfield areas -	Oppose	Opposes the avoidance/prohibited approach to greenfield development. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have	Delete map.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Wellington City Council.		positive outcomes for the community or for freshwater. Considers the prohibited activity status is inconsistent with the NPS-UD.	
S161.044	13 Maps	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Oppose	Opposes the avoidance/prohibited approach to greenfield development. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. Considers the prohibited activity status is inconsistent with the NPS-UD.	Delete map.
S161.045	13 Maps	Map 89: Unplanned greenfield areas - Hutt City Council.	Oppose	Opposes the avoidance/prohibited approach to greenfield development. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. Considers the prohibited activity status is inconsistent with the NPS-UD.	Delete map.

S274 Goodman Contractors Limited

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S274.001	2 Interpretation	Earthworks	Oppose	Doesn't make sense to have different definitions for earthworks between different districts in the same region.	Retain the old definition for the entire region.
S274.002	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Oppose	Considers changing discharge standards is onerous for contractors as suspended solids tests take time for results whereas turbidity which is a real time test. Queries who is a 'suitably qualified person' for taking tests and why the policy uses 100g/m3, as at a point in time after rainfall every site across the region could be non-compliant. Notes that working in a heavy materials could mean a high suspended solids reading but a low turbidity reading.	Amend provision to provide for the standard measure of NTU.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S274.003	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose	Concerns on economic impact of shutting down all earthworks over winter and that there has to be a balance between environment and commercial viability. Considers where sites are low risk and contractors capable of taking care of the environment then winter work should be able to occur and permits/consent able to be sought.	Amend PC1 to provide more enabling framework for winter works.
S274.004	9 Te Awarua-o-Porirua Whaitua	Policy P.P31: Water takes at minimum flows and minimum water levels.	Oppose	Water is a necessity in dusty conditions, and water take necessary for environmental control should be able to be taken in accordance with consent requirements.	Amend provision to enable water takes necessary for environmental controls.

S202 Graeme Iain Shellard , Sarah Elizabeth Shellard, Cameron Anthony Shellard, Finlay David Shellard

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S202.001	General comments	General comments - rural	Not Stated	(refer to raw submission for screenshot of question and answer from consultation) Considers the logic applied by the Council is fundamentally flawed and demonstrates a bias. Considers that there should be a representation of other land uses, and their expected contribution - including forestry and wildlife - on Colletts Stream catchment. Notes there are more wild deer, pigs, possums and potentially goats than farmed cattle, pigs and sheep. Considers it untrue that because lifestyle blocks have better pasture, they have higher stock levels per hectare. Considers the plan is targeting lifestyle blocks	Withdraw PC1. Develop and implement improvements through community-based support / education supported by measurements and reporting

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				based on an inference, an unvalidated assumption and the exclusion of other causes of the problem. Considers the lack of information will incur significant regretful spend.	
S202.002	General comments	General comments - overall	Not Stated	Considers the plan change attempts to change behaviour through legislation without any understanding of cost or impact and without consideration of costs for enforcement Considers no serious attempt has been made with landowners to discuss and address the perceived issues. Considers PC1 is fundamentally flawed, expensive and unmanageable, does not align with the direction of the government, and the option to work with landowners was not explored effectively.	Withdraw PC1. Develop and implement improvements through community-based support / education supported by measurements and reporting
S202.003	General comments	General comments - overall	Not Stated	Notes there is no information on RPS Plan Change 2. Considers the content of plan change 2 could have a material impact on submitters response to Plan Change 1 and could be detrimental to their understanding of the council's overall plan.	Share Plan change 2 high level changes or topics, and plan change 1 consultation be repeated to allow consideration of planned change 2 in response
S202.004	General comments	General comments - consultation	Not Stated	Considers the consultation process, including timeframes, was inadequate. Considers PC1 documents are not written in plain English, are difficult and cannot easily be viewed or digested.	Stop PC1 process and split the plan into digestible sub plans with a focus on users. Complete discussions with the wider group to identify when support can best be provided.
S202.005	General comments	General comments - economic cost/impact	Not Stated	Considers the cost of this work and the impact has not been effectively considered. Notes a range of activities associated with PC1 that will incur additional costs and that these costs are either incurred by GWRC or the landowner Considers these costs are extreme for the value gained and the source and value of funding required is not addressed. Considers it likely that there will be a split between landowners that comply and the approach to forcing	Withdraw PC1. Develop and implement improvements through community-based support / education supported by measurements and reporting. Run workshops with the wider impacted community to review the originally considered high level options including all costs and benefits, impacts and high-level risks.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				landowners to comply, which is abrasive, divisive, expensive and unlikely to succeed.	
S202.006	5.4 Beds of lakes and rivers	5.4.5 Uses of beds of lakes and rivers.	Oppose	Consider this unnecessarily limiting to prevent scouring increasing and there are many situations where planting is not appropriate. Notes gabions and concrete blocks are used throughout the Hutt and Mangaroa valley since in many situations they are appropriate.	Reinstate the use of erosion protection structures.
S202.007	8 Whaitua Te Whanganui-a-Tara	Table 8.3 Primary contact site objectives in rivers.	Oppose	Notes there is no date range of collection of baseline data, no information relating to data collection or relating to recent weather patterns or river flows, nor any ongoing major works (including deforestation / harvesting) which impact water quality. Considers this means the information presented is flawed.	Withdraw PC1. Develop and implement improvements through community-based support / education supported by measurements and reporting
S202.008	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Oppose	Notes there is no date range of collection of baseline data, no information relating to data collection or relating to recent weather patterns or river flows, nor any ongoing major works (including deforestation / harvesting) which impact water quality. Considers this means the information presented is flawed.	Withdraw PC1. Develop and implement improvements through community-based support / education supported by measurements and reporting

S238 Greater Wellington Regional Council

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S238.001	General comments	General comments - definitions	Amend	Notes the NES-PF has been replaced by the NES-CF. Amend in PC1 provisions to replace NES-PF with NES-CF.	~~plantation~~ **commercial** forestry / ~~plantation~~ **commercial** forestry
S238.002	General comments	General comments - definitions	Amend	Suggest a new definition of "urban zone" to support the definition of unplanned greenfield development.	Include new definition as follows:**Urban zones are the following zones as set out in the National Planning standards:** **• Residential zones (large lot residential, low density residential, general residential, medium density**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					residential, high density residential) **• Commercial and mixed-use zones (neighbourhood centre, local centre, commercial, large format retail, mixed use, town centre, metropolitan centre, city centre)** **• Industrial zones (light industrial, general industrial, heavy industrial)** **• Special purpose zones unless it can be demonstrated that the special purpose zone is a rural zone.**
S238.003	General comments	General comments - definitions	Amend	Amend to update PC1 to NES-CF that replaced NES-PF after PC1 was notified	Insert new definition as follows: **Commercial forestry has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2017**
S238.004	2 Interpretation	Hydrological control	Amend	Considers there's a lack of clarity around what is required to be achieved through hydrological control, how this is done and there are different requirements needed for different scenarios.	Provide greater specificity in the definition, policies and/or rules relating to hydrological control to make it clear what is required to be achieved and how and in what circumstances (i.e. are different requirements needed in different scenarios). The inclusion of a metric should be considered.
S238.005	2 Interpretation	Nitrogen discharge risk	Amend	Notes definition is incorrectly worded.	Amend as follows: The quantitative assessment of nitrogen loss risk as determined using a recognised **nitrogen** risk assessment tool
S238.006	2 Interpretation	Recognised Nitrogen Risk Assessment Tool	Amend	Notes definition is incorrectly worded.	Amend as follows: The tool that provides a quantitative assessment of risk of diffuse nitrogen discharge from rural land that has been approved for use as a recognised **nitrogen** risk assessment tool by the Wellington Regional Council.
S238.007	2 Interpretation	Registered forestry adviser	Amend	Notes the legislation reference needs updating	Amend as follows: Registered forestry adviser Means a person registered under s63Q or s63T of Forests ~~(Regulation of Log Traders and Forestry Advisers) Amendment~~ Act **1949** ~~2020 that~~ **who** is authorised to give advice that relates to:
S238.008	2 Interpretation	Small stream riparian programme	Amend	Notes that consequential amendment is required as a result of changes to Schedule	Amend definition as follows: A programme prepared in compliance with Schedule 36**A** ~~(farm environment plan - additional~~ **Small stream riparian programme)**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S238.009	2 Interpretation	Unplanned greenfield development	Amend	Suggests amendments to clarify the intent of the definition.	Amend definition as follows: Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 which **as at 30 October 2023** also requires an underlying zone change **to an urban zone, future urban zone or settlement zone** ~~(from rural/non urban/openspace to urban)~~ through a District Plan change to enable the development.~~Note: Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023.~~
S238.010	8 Whaitua Te Whanganui-a-Tara	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	Amend	Seeks clarification of the intent of this objective	Amend objective as follows: Groundwater flows and levels, and water quality, are maintained at levels that: (a) ensure base flows or levels in surface water bodies and springs are supported, **(b)** and salt-water intrusion **into the aquifer** is avoided **and there is no landward movement of the salt water/freshwater interface,** and... Renumber remaining clauses.
S238.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Suggests correcting terminology for consistency across PC1	Replace 'impervious area(s)' with 'impervious surface(s)' in rules WH.R5, WH.R6 and WH.R7
S238.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces -	Amend	Suggests correcting terminology for consistency across PC1	Replace 'impervious area(s)' with 'impervious surface(s)' in rules WH.R5, WH.R6 and WH.R7

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		controlled activity.			
S238.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Amend	Suggests correcting terminology for consistency across PC1	Replace 'impervious area(s)' with 'impervious surface(s)' in rules WH.R5, WH.R6 and WH.R7
S238.014	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Amend	Notes reference is to the incorrect regulation	Amend as follows: Resource Management (National Environmental Standards for ~~Freshwater~~ **Commercial Forestry)** Regulations ~~2020~~ **2017**
S238.015	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Amend	Notes replanting is an element of commercial forestry that is intended to be included in these rules	Amend as follows: Afforestation, harvesting, **replanting,** earthworks, or mechanical land preparation for ~~plantation~~ **commercial** forestry,...
S238.016	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry - discretionary activity.	Amend	Notes replanting is an element of commercial forestry that is intended to be included in these rules	Amend as follows: Afforestation, harvesting, **replanting,** earthworks, or mechanical land preparation for ~~plantation~~ **commercial** forestry,...
S238.017	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on	Amend	Notes replanting is an element of commercial forestry that is intended to be included in these rules	Amend as follows: Afforestation, harvesting, **replanting,** earthworks, or mechanical land preparation for ~~plantation~~ **commercial** forestry,...

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		highest erosion risk land - prohibited activity.			
S238.018	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	Notes Rule WH.R23 should apply to all earthworks.	Amend as follows: Earthworks is a permitted activity, provided the following conditions are met:~~(a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or~~ ~~(b) the earthworks are to implement an action in the farm environment plan for the farm, or~~ (~~c~~a) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (~~i~~b) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken ..., and (~~ii~~c) soil or debris from earthworks is not placed..., and (~~iii~~d) the area of earthworks must be stabilised ..., and (~~iv~~e) there is no discharge of sediment ..., and (~~v~~f) erosion and sediment control... .
S238.019	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Amend	Considers rules should relates to effective area used rather than parcel size	Amend as follows: "Rule WH.R26: Farming activities on ~~a property of~~ between 4 and 20 hectares of land - permitted activity The use of ~~land on a property of~~ 4 hectares or more and less than 20 hectares of land on a property for:" (d) the property is registered with the Wellington Regional Council in accordance with Schedule 35 (farm registration) by ~~1 August~~ **30 October 2025, and** **(e)** from **30 October 2025** the **nitrogen discharge risk...** (or other suitable date)
S238.020	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20	Amend	Considers wording is not clear when certification of the FEP is required.	Amend as follows: (c) **within six months of the** ~~a~~ farm environment plan being supplied to council a farm environment plan certifier certifies in writing that...." Or make such other amendment as necessary to ensure that

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		hectares or more of land - permitted activity.			date by which certification is required is clear and that the Wellington Regional Council is advised of, and supplied with, the final certified version of the FEP
S238.021	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers provisions are unclear and inferred an FEP was required for all properties which was not the intent	Delete clauses (b) and (c) and replace with the following:**(b) a small stream riparian programme is prepared in accordance with Schedule 36A (Small Stream Riparian Plan) and,** **(c) if a farm environment plan for the property is required by any rule in this plan, included in that farm environment plan; and** **(d) if condition (c) applies, a farm environment plan certifier certifies in writing that, in addition to the requirements of Schedule Z (farm environment plans) and Schedule 36 (farm environment plans - additional matters), the farm environment plan meets the requirements of Schedule 36A (Small Stream Riparian Programme), and** **(e) If not included within a farm environment plan, the small stream riparian programme has been certified as meeting the requirements of Schedule 36A (Small Stream Riparian Plan) by a person approved by the Wellington Regional Council.**
S238.022	8 Whaitua Te Whanganui-a-Tara	Rule WH.R30: The use of land for farming activities - discretionary activity.	Amend	Notes reference to 'change' in land use is incorrect	Amend Rule WH.30 (b) as follows: if the most recent Wellington Regional Council monitoring record at the time the application is lodged demonstrates that the concentration of Escherichia coli, for the relevant catchment exceeds the target attribute state at any monitoring site within the relevant part Freshwater Management Unit set out in Table 8.4, the land use ~~change~~ is not ~~to~~ pastoral land use.
S238.023	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped	Amend	Suggests correcting terminology for consistency across PC1	Replace 'impervious area(s)' with 'impervious surface(s)' in rules P.R5, P.R6 and P.R7

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		impervious surfaces - permitted activity.			
S238.024	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Suggests correcting terminology for consistency across PC1	Replace 'impervious area(s)' with 'impervious surface(s)' in rules P.R5, P.R6 and P.R7
S238.025	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas- controlled activity.	Amend	Suggests correcting terminology for consistency across PC1	Replace 'impervious area(s)' with 'impervious surface(s)' in rules P.R5, P.R6 and P.R7
S238.026	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry - controlled activity.	Amend	Notes reference is to the incorrect regulation	Amend as follows: Resource Management (National Environmental Standards for ~~Freshwater~~ **Commercial Forestry**) Regulations ~~2020~~ **2017**
S238.027	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry - controlled activity.	Amend	Notes replanting is an element of commercial forestry that is intended to be included in these rules	Amend as follows: The use of land for afforestation, harvesting, **replanting,** earthworks, or mechanical land preparation for plantation commercial forestry,...

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S238.028	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry - discretionary activity.	Amend	Notes replanting is an element of commercial forestry that is intended to be included in these rules	Amend as follows: The use of land for afforestation, harvesting, **replanting,** earthworks, or mechanical land preparation for plantation commercial forestry,...
S238.029	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity.	Amend	Notes replanting is an element of commercial forestry that is intended to be included in these rules	Amend as follows: Afforestation, **replanting, and associated** earthworks, or mechanical land preparation for ~~plantation~~ **commercial** forestry,...
S238.030	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Amend	Notes Rule WH.R23 applies to all earthworks.	Amend as follows: Earthworks is a permitted activity, provided the following conditions are met:~~(a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, or~~ (~~c~~a) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (~~i~~b) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken ..., and (~~ii~~c) soil or debris from earthworks is not placed..., and (~~iii~~d) the area of earthworks must be stabilised ..., and (~~iv~~e) there is no discharge of sediment ..., and (~~v~~f) erosion and sediment control... .
S238.031	9 Te Awarua-o-Porirua Whaitua	Rule P.R25: Farming activities on properties of	Amend	Notes rule should relate to effective area used rather than parcel size, and dates in this provision should be consistent	Amend as follows: "Rule P.R25: Farming activities on ~~a property of~~ between 4 hectares and 20 hectares **of land**- permitted activity The use ~~of land on a property of~~ 4 hectares or more and less than 20 hectares **of land on a property** for:" (d) the property is registered with the Wellington Regional Council in accordance with Schedule 35 (farm registration)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		between 4 hectares and 20 hectares - permitted activity.			by ~~1 August~~ **30 October** 2025, and (e) from 30 October 2025 the nitrogen discharge risk... (or other suitable date)
S238.032	9 Te Awarua-o-Porirua Whaitua	Rule P.R26: Farming activities on 20 hectares or more of land - permitted activity.	Amend	Considers wording is not clear when certification of the FEP is required.	Amend as follows: (c) **within six months of the farm environment plan being supplied to council** a farm environment plan certifier certifies in writing that...." Or make such other amendment as necessary to ensure that date by which certification is required is clear and that the Wellington Regional council is advised of, and supplied with, the final certified version of the FEP.
S238.033	9 Te Awarua-o-Porirua Whaitua	Table 9.5: Phase in of farm environment plans for Part Freshwater Management Units.	Amend	Considers dates may be premature given likely FW-FP roll-out and there is a need to ensure dates and requirements of NRP align with those gazetted for Freshwater Farm Plans under national regulations.	Delete Table 9.5 and replace reference in Rule P.R26 (a) to "the date specified in Table 9.5 for the part Freshwater Management Unit where the land is located" with the specific date of 1 December 2027 or such other date may be specified in the NZ Gazette as the date on which Freshwater Farm Plans must be submitted for certification on Te Awarua-o-Porirua Whaitua. Or, in the alternative, make whatever amendments to the rule as may be necessary to ensure alignment between the timing of provision of FEPs and any FW-FPs as may be required by national regulations.
S238.034	9 Te Awarua-o-Porirua Whaitua	Rule P.R27: The use of land for farming activities - discretionary activity.	Amend	Notes the reference to change in land use is incorrect.	Amend Rule P.R.27 (b) as follows: (b) if the most recent Wellington Regional Council monitoring record at the time the application is lodged demonstrates that the concentration of Escherichia coli, for the relevant catchment exceeds the target attribute state at any monitoring site within the relevant part Freshwater Management Unit set out in Table 9.2, the use of land ~~under Rule P.R26~~ is not ~~changed to~~ pastoral land use.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S238.035	12 Schedules	A Certification requirements under the Resource Management (Freshwater Farm Plans) Regulations 2023.	Amend	Notes this part omits to mention the Small Stream Riparian Programme now required under Schedule 36A	Insert new 2 (da) as follows:**The requirements in relation to a small streams riparian programme set out in Schedule 36A, and**
S238.036	12 Schedules	F Small stream riparian programme.	Amend	Considers small stream riparian programme needs to apply to 4-20 hectare properties and therefore should exist independent of an FEP	Amend Part F of Schedule 36 as follows:**F Small stream riparian programme** A farm environment plan for a farm in the Makara or Mangaroa catchment must include a small stream riparian programme that contains ~~the following~~ **the matters set out in Schedule 36A.** Delete the balance of Part F
S238.037	12 Schedules	F Small stream riparian programme.	Amend	Considers small stream riparian programme needs to apply to 4-20 hectare properties and therefore should exist independent of an FEP	Add a new Schedule 36A as follows:**Schedule 36A: Small stream riparian programme** **A small stream riparian programme for a property or farm in the Makara or Mangaroa catchments much contain the following:** **1. An assessment of the risk of cattle, farmed, deer or farmed pigs accessing rivers that are less than 1m wide and the associated risk of stream bed erosion, direct deposition of animal excreta and disturbance of beds.** **2. An assessment of the:** **(a) options and feasibility of those options, for excluding cattle, farmed deer and farmed pigs from small rivers where the risks are assessed as high, and** **(b) Any adverse effects of establishing permanent fencing and whether these effects outweigh the benefits of permanent fencing.**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					3. Where fencing is not practicable, or the adverse effect of fencing outweigh the benefits, the measures to be taken to minimise the necessity or propensity for cattle, farmed deer or farmed pigs to access rivers (including provision of reticulated drinking water and stock shelter/shading. **4. Where the exclusion of cattle, farmed deer and farmed pigs is not achievable, a riparian revegetation programme is to be implemented as an offset measure for unavoidable effects.**

S197 Greg Davies

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S197.001	General comments	General comments - overall	Not Stated	Submitter values the water quality values of the following areas for contact recreation and ecosystem health: i. Te Awakairangi / the Hutt River ii. Akatarawa River iii. Whakatikei River iv. Titahi Bay v. Lyall Bay vi. Otaki River Considers the natural form and character of these waterbodies is an important part of their value. Natural form and character creates rapids and other features of these sections of river that make them valuable for kayaking. Considers Te Awakairangi / the Hutt Gorge is an outstanding run for whitewater kayaking, which traverses what they consider to be an outstanding landscape with outstanding amenity values	Requests the outstanding value of this section [Te Awakairangi / the Hutt Gorge] of river recognised in the plan.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers the natural and wildlife values of these areas important.	
S197.002	General comments	General comments - freshwater	Not Stated	Concerned with increased sediment in the Hutt River when flows increase and potential e.coli and pathogen loads in the water. Observes algae in summer months when flows are low resulting in issues with recreation and amenity as well as human health when making contact with water. Concerned that river engineering such as railway iron degrades water quality and creates potential hazards for river users when slash and logs get caught on structures.	Not Stated.
S197.003	General comments	General comments - overall	Support	Supports PC1 and the initiatives to improve water quality in catchments.	Requests that GWRC initiatives are carried through to the operative plan, particularly where they protect and restore ecosystem health, contact recreation values, natural form and character, and amenity.
S197.004	General comments	General comments - freshwater	Support	Supports the concept of Te Mana o te Wai and the hierarchy of obligations.	Prioritise ecosystem health and contact recreation.
S197.005	General comments	General comments - water quality improvements	Support	Concerned with water quality, (particularly e. coli, sediment, algal growth/periphyton, and ecosystem health); amenity; contact recreation; and natural form and character.	Seeks the following: Recognition in the plan of the outstanding kayaking/packrafting/rafting values in the Whaitua, particularly for the Hutt Gorge (which has outstanding kayaking, amenity, and landscape values). More work by GWRC to monitor and preserve natural character and to strengthen objectives, policies, and rules which allow the river to function more naturally, particularly in its reaches influenced by flood protection. Targets for natural character that are similar to the targets set for water quality and objectives and policies to support these.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					More work to enhance water quality in the coastal environment, for use of 'flat water' environments to learn and train without compromising health if contact is made with the water. Retain coastal water quality indicators/targets.
S197.006	General comments	General comments - target attribute states	Support	Supports water quality targets.	Requests as much work as possible is done through environmental limits to achieve these targets.

S186 Guardians of the Bays Inc

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S186.001	General comments	General comments - overall	Support	Supports the direction of Plan Change 1.	Not stated
S186.002	General comments	General comments - water bodies	Support	Supports stronger environmental regulation in relation to rivers, streams and stormwater to the sea.	Not stated
S186.003	General comments	General comments - water bodies	Support	Supports objectives for freshwater and coastal water.	Not stated
S186.004	2 Interpretation	Catchment management unit	Support	Not stated	Not stated
S186.005	2 Interpretation	Coastal water management units	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S186.006	2 Interpretation	Containment standard	Support	Not stated	Not stated
S186.007	2 Interpretation	Dry weather discharges	Support	Not stated	Not stated
S186.008	2 Interpretation	Earthworks	Support	Not stated	Not stated
S186.009	2 Interpretation	Environmental outcomes	Support	Not stated	Not stated
S186.010	2 Interpretation	Erosion and sediment management plan	Support	Not stated	Not stated
S186.011	2 Interpretation	Erosion risk treatment plan	Support	Not stated	Not stated
S186.012	2 Interpretation	Existing wastewater discharge	Support	Not stated	Not stated
S186.013	2 Interpretation	High risk industrial or trade premise	Support	Not stated	Not stated
S186.014	2 Interpretation	Hydrological control	Support	Not stated	Not stated
S186.015	2 Interpretation	Impervious surfaces	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S186.016	2 Interpretation	Redevelopment	Support	Not stated	Not stated
S186.017	2 Interpretation	Stormwater	Support	Not stated	Not stated
S186.018	2 Interpretation	Stormwater catchment or sub-catchment	Support	Not stated	Not stated
S186.019	2 Interpretation	Stormwater management strategy	Support	Not stated	Not stated
S186.020	2 Interpretation	Stormwater network	Support	Not stated	Not stated
S186.021	2 Interpretation	Stormwater treatment system	Support	Not stated	Not stated
S186.022	2 Interpretation	Wet weather overflows	Support	Not stated	Not stated
S186.023	2 Interpretation	Whaitua	Support	Not stated	Not stated
S186.024	3 Objectives	Table 3.4 Rivers and Streams.	Amend	Not stated	Replace in table 3.4 the words " appropriate for the area" with "in a healthy ecological state".
S186.025	3 Objectives	Table 3.5 Lakes.	Support	Not stated	Not stated
S186.026	3 Objectives	Table 3.6 Groundwater.	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S186.027	3 Objectives	Table 3.7 Natural wetlands.	Support	Not stated	Not stated
S186.028	3 Objectives	Table 3.8 Coastal waters.	Support	Not stated	Not stated
S186.029	3 Objectives	Objective O19: Biodiversity, aquatic ecosystem health and mahinga kai in fresh water bodies and the coastal marine area are safeguarded.	Amend	Not stated	Amend as follows: Objective O19 Biodiversity, aquatic ecosystem health and mahinga kai in freshwater bodies and the coastal marine area are safeguarded such that: (a) water quality, flows, water levels and aquatic and coastal habitats are managed to maintain**and improve biodiversity,** aquatic ecosystem health and mahinga kai, and (b) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a freshwater body or coastal marine area is meaningfully improved so that the objective is met within a reasonable timeframe, and (c) restoration of aquatic ecosystem health and mahinga kai is ~~encouraged~~ **undertaken and required where land is developed that contains freshwater bodies** Note For the purposes of this objective 'a reasonable timeframe' is a date for the applicable water body or coastal marine area inserted into this Plan through the plan change/s required by the RMA to implement the NPS-FM 2020, 2035 if no other date is specified by 31 December 2026. Aquatic ecosystem health and mahinga kai objectives Table 3.4 Rivers and streams, page 16
S186.030	3 Objectives	Objective O25: Outstanding water bodies identified in Schedule	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		A (outstanding water bodies) and their significant values are protected and restored.			
S186.031	3 Objectives	Objective O28: Ecosystems and habitats with significant indigenous biodiversity values are protected from the adverse effects of use and development, and where appropriate restored to a healthy functioning state including as defined by Tables	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		3.4, 3.5, 3.6, 3.7 and 3.8.			
S186.032	4 Policies	Policy P65: National Policy Statement for Freshwater Management requirements for discharge consents.	Support	Not stated	Not stated
S186.033	4 Policies	Policy P71: Managing the discharge of nutrients.	Support	Not stated	Not stated
S186.034	4 Policies	Policy P72: Priority Catchments.	Support	Not stated	Not stated
S186.035	4 Policies	Policy P79: Quality of point source discharges to rivers.	Support	Not stated	Not stated
S186.036	4 Policies	Policy P82:	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Avoiding inappropriate discharges to water.			
S186.037	4 Policies	Policy P83: Minimising adverse effects of stormwater discharges.	Support	Not stated	Not stated
S186.038	4 Policies	Policy P84: Managing land use impacts on stormwater.	Support	Not stated	Not stated
S186.039	4 Policies	Policy P85: Development of a stormwater management strategy for first-stage local authority and state highway network consents.	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S186.040	4 Policies	Policy P86: Second-stage local authority and state highway network consents.	Support	Not stated	Not stated
S186.041	4 Policies	Policy P87: Minimising wastewater and stormwater interactions.	Support	Not stated	Not stated
S186.042	4 Policies	Policy P88: Assessing resource consents to discharge stormwater containing wastewater.	Support	Not stated	Not stated
S186.043	4 Policies	Policy P30: Biodiversity, aquatic ecosystem health and mahinga kai.	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S186.044	4 Policies	Policy P36: Restoring Wairarapa Moana	Support	Not stated	Not stated
S186.045	4 Policies	Policy P78: Managing point source discharges for aquatic ecosystem health and mahinga kai.	Support	Not stated	Not stated
S186.046	5.1 Air quality rules	Rule R1: Outdoor burning - permitted activity.	Support	Firefighting training on Wellington Airport could occur in the coastal marine area.	Not stated
S186.047	5.1 Air quality rules	Rule R3: Outdoor burning for firefighter training - permitted activity.	Support	Airport fire service training at Wellington Airport could be done in the coastal marine area.	Not stated
S186.048	5.1 Air quality rules	Rule R7: Natural gas and liquefied petroleum gas - permitted activity.	Amend	Large scale natural gas and liquefied petroleum gas should not be burnt in the climate emergency we are in.	Include interim measurable milestones of phasing out large scale natural gas and liquefied petroleum gas generators.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S186.049	5.1 Air quality rules	Rule R8: Diesel or kerosene blends - permitted activity.	Amend	Diesel and kerosene blends should not be burnt in the climate emergency we are in.	Include interim measurable milestones of phasing out large scale diesel or kerosene blend generators.
S186.050	5.1 Air quality rules	Rule R9: Biogas - permitted activity.	Neutral	Not stated	Not stated
S186.051	5.1 Air quality rules	Rule R10: Untreated wood - permitted activity.	Neutral	Not stated	Not stated
S186.052	5.1 Air quality rules	Rule R11: Coal, light fuel oil, and petroleum distillates of higher viscosity - permitted activity.	Amend	Coal, light fuel oil, and petroleum distillates of higher viscosity should not be burnt in the climate emergency we are in.	Include interim measurable milestones of phasing out large scale coal, light fuel oil and petroleum distillates of high viscosity generators.
S186.053	5.1 Air quality rules	Rule R14: Spray coating within an enclosed space - permitted activity.	Neutral	Not stated	Not stated
S186.054	5.1 Air quality rules	Rule R15: Spray coating not within an	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		enclosed space - permitted activity.			
S186.055	5.1 Air quality rules	Rule R16: Printing processes - permitted activity.	Neutral	Not stated	Not stated
S186.056	5.1 Air quality rules	Rule R17: Dry cleaning - permitted activity.	Neutral	Not stated	Not stated
S186.057	5.1 Air quality rules	Rule R18: Fume cupboards - permitted activity.	Neutral	Not stated	Not stated
S186.058	5.1 Air quality rules	Rule R19: Workplace ventilation - permitted activity.	Neutral	Not stated	Not stated
S186.059	5.1 Air quality rules	Rule R20: Mechanical processing of metals - permitted activity.	Neutral	Not stated	Not stated
S186.060	5.1 Air quality rules	Rule R21: Thermal metal spraying - permitted activity.	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S186.061	5.1 Air quality rules	Rule R25: Abrasive blasting within an enclosed booth - permitted activity.	Neutral	Not stated	Not stated
S186.062	5.1 Air quality rules	Rule R26: Abrasive blasting outside an enclosed area - permitted activity.	Neutral	Not stated	Not stated
S186.063	5.1 Air quality rules	Rule R27: Handling of bulk solid materials - permitted activity.	Neutral	Not stated	Not stated
S186.064	5.1 Air quality rules	Rule R28: Cement storage - permitted activity.	Neutral	Not stated	Not stated
S186.065	5.1 Air quality rules	Rule R29: Alcoholic beverage production - permitted activity.	Neutral	Not stated	Not stated
S186.066	5.1 Air quality rules	Rule R30: Coffee roasting -	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
S186.067	5.1 Air quality rules	Rule R31: Food, animal or plant matter manufacturing and processing - permitted activity.	Neutral	Not stated	Not stated
S186.068	5.1 Air quality rules	Rule R33: Petroleum storage or transfer facilities - permitted activity.	Neutral	Not stated	Not stated
S186.069	5.1 Air quality rules	Rule R34: Mobile source emissions - permitted activity.	Neutral	Not stated	Not stated
S186.070	5.1 Air quality rules	Rule R35: Water and wastewater processes - permitted activity.	Neutral	Not stated	Not stated
S186.071	5.1 Air quality rules	Rule R35A: Gas processes - permitted activity.	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S186.072	5.1 Air quality rules	Rule R36: Drying and heating of minerals - permitted activity.	Neutral	Not stated	Not stated
S186.073	5.1 Air quality rules	General conditions for the discharge of agrichemicals.	Support	Not stated	Not stated
S186.074	5.1 Air quality rules	Rule R37: Handheld discharge of agrichemicals - permitted activity.	Support	Not stated	Not stated
S186.075	5.1 Air quality rules	Rule R38: Motorised and aerial discharge of agrichemicals - permitted activity.	Support	Not stated	Not stated
S186.076	5.1 Air quality rules	Rule R39: Agrichemicals not permitted - restricted discretionary activity.	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S186.077	5.1 Air quality rules	Rule R40: Fumigation - permitted activity.	Neutral	Not stated	Not stated
S186.078	5.1 Air quality rules	Rule R42: All other discharges - discretionary activity.	Neutral	Not stated	Not stated
S186.079	5.2 and 5.3 Discharges to land and water and land use rules	Rule R48: Stormwater from an individual property - permitted activity.	Neutral	Not stated	Not stated
S186.080	5.2 and 5.3 Discharges to land and water and land use rules	Rule R49: Stormwater from new subdivision and development - permitted activity.	Neutral	Not stated	Not stated
S186.081	5.2 and 5.3 Discharges to land and water and land use rules	Rule R50: Stormwater from new subdivision and development - restricted discretionary activity.	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S186.082	5.2 and 5.3 Discharges to land and water and land use rules	Rule R51: Stormwater to land - permitted activity.	Neutral	Not stated	Not stated
S186.083	5.2 and 5.3 Discharges to land and water and land use rules	Rule R52: Stormwater from a local authority or state highway network - controlled activity.	Neutral	Not stated	Not stated
S186.084	5.2 and 5.3 Discharges to land and water and land use rules	Rule R53: Stormwater from a local authority or state highway network with a stormwater management strategy - restricted discretionary activity.	Neutral	Not stated	Not stated
S186.085	5.2 and 5.3 Discharges to land	Rule R54: Stormwater from a port or	Support	The effects of airport stormwater, which enters Lyall Bay Beach, needs to be properly managed in relationship to recreation users, people taking mahinga kai and the natural ecosystem.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	and water and land use rules	airport - restricted discretionary activity.			
S186.086	5.2 and 5.3 Discharges to land and water and land use rules	Rule R55: All other stormwater - discretionary activity.	Neutral	Not stated	Not stated
S186.087	6 Other methods	Method M36: Freshwater Action Plan programme.	Support	Not stated	Not stated
S186.088	6 Other methods	Method M37: Freshwater Action Plan for the Parangarahu Lakes.	Support	Not stated	Not stated
S186.089	6 Other methods	Method M38: Freshwater Action Plan for the Rangituhi catchment.	Support	Not stated	Not stated
S186.090	6 Other methods	Method 39: Freshwate	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		r Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.			
S186.091	6 Other methods	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Support	Not stated	Not stated
S186.092	6 Other methods	Method M41: Identifying and responding to degradation in	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.			
S186.093	6 Other methods	Method M43: Supporting the health of urban waterbodies.	Support	Not stated	Not stated
S186.094	6 Other methods	Method M45: Funding of wastewater and stormwater network upgrades	Support	Additional funding is important to upgrade the Wellington City Council stormwater network and wastewater catchments.	Not stated
S186.095	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te	Amend	Timeframes to achieve fresh water outcomes should include interim and measurable milestones (such as by 2035).	Include interim measurable milestones such as by 2035, 2050 and 2070 as well as the ultimate 2100.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Whanganui-a-Tara is progressively improved and is wai ora by 2100.			
S186.096	8 Whaitua Te Whanganui-a-Tara	Objective WH.O2: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora.	Support	Not stated	Not stated
S186.097	8 Whaitua Te Whanganui-a-Tara	Objective WH.O3: The health and wellbeing of coastal	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved to achieve the coastal water objectives set out in Table 8.1.			
S186.098	8 Whaitua Te Whanganui-a-Tara	Table 8.1 Coastal water objectives.	Support	Not stated	Not stated
S186.099	8 Whaitua Te Whanganui-a-Tara	Objective WH.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased and the long-term	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		population numbers of these species and the area over which they occur are increased, improving their threat classification status.			
S186.100	8 Whaitua Te Whanganui-a-Tara	Table 8.2 Target attribute states for lakes.	Support	Not stated	Not stated
S186.101	8 Whaitua Te Whanganui-a-Tara	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	Support	Not stated	Not stated
S186.102	8 Whaitua Te Whanganui-a-Tara	Policy WH.P1: Improvement of aquatic ecosystem health.	Support	Not stated	Not stated
S186.103	8 Whaitua Te	Policy WH.P2 Managem	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	ent of activities to achieve target attribute states and coastal water objectives.			
S186.104	8 Whaitua Te Whanganui-a-Tara	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Support	Not stated	Not stated
S186.105	8 Whaitua Te Whanganui-a-Tara	Policy WH.P4: Achievement of the visual clarity target attribute states.	Support	Not stated	Not stated
S186.106	8 Whaitua Te Whanganui-a-Tara	Table 8.5: Sediment load reductions required to achieve the visual clarity target	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		attribute states.			
S186.107	8 Whaitua Te Whanganui-a-Tara	Policy WH.P5: Localised adverse effects of point source discharge.	Support	Not stated	Not stated
S186.108	8 Whaitua Te Whanganui-a-Tara	Policy WH.P6: Cumulative adverse effects of point source discharges.	Support	Not stated	Not stated
S186.109	8 Whaitua Te Whanganui-a-Tara	Policy WH.P7: Discharges to groundwater.	Support	Not stated	Not stated
S186.110	8 Whaitua Te Whanganui-a-Tara	Policy WH.P8: Avoiding discharges of specific products and waste.	Support	Not stated	Not stated
S186.111	8 Whaitua Te Whanganui-a-Tara	Policy WH.P9: General stormwater policy to achieve	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		the target attribute states and coastal water objectives.			
S186.112	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	Support	Not stated	Not stated
S186.113	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Support	Not stated	Not stated
S186.114	8 Whaitua Te Whanganui-a-Tara	Policy WH.P12: Managing stormwater from a port or airport.	Support	Effects from stormwater from Wellington Airport entering Lyall Bay Beach need to be properly managed.	Not stated
S186.115	8 Whaitua Te Whanganui-a-Tara	Policy WH.P13: Managing stormwate	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		r network discharges through a Stormwater Management Strategy.			
S186.116	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Support	Not stated	Not stated
S186.117	8 Whaitua Te Whanganui-a-Tara	Policy WH.P17: General wastewater policy to achieve target attribute states and coastal objectives.	Support	Not stated	Not stated
S186.118	8 Whaitua Te Whanganui-a-Tara	Policy WH.P18: Progressing works to meet Escherichia coli target	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		attribute states.			
S186.119	8 Whaitua Te Whanganui-a-Tara	Policy WH.P19: Managing wastewater network catchment discharges.	Support	Not stated	Not stated
S186.120	8 Whaitua Te Whanganui-a-Tara	Policy WH.P20: Managing existing wastewater treatment plant discharges.	Support	Not stated	Not stated
S186.121	8 Whaitua Te Whanganui-a-Tara	Rule WH.R1: Point source discharges of specific contaminants - prohibited activity.	Support	Not stated	Not stated
S186.122	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Support	Not stated	Not stated
S186.123	8 Whaitua Te	Rule WH.R3: Stormwate	Support	Stormwater from an airport into coastal water should not be a permitted activity.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	r from an existing individual property to surface water or coastal water - permitted activity.			
S186.124	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Support	Not stated	Not stated
S186.125	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Support	Not stated	Not stated
S186.126	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		surfaces - controlled activity.			
S186.127	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Support	Not stated	Not stated
S186.128	8 Whaitua Te Whanganui-a-Tara	Rule WH.R8: Stormwater from a port or airport - restricted discretionary activity.	Amend	Stormwater from the Wellington Airport discharges into Lyall Bay, a high recreational area. It is not just 'contact recreation that is affected and should be all recreation.	Add Matters for discretion: 1. The management of the adverse effects of stormwater capture and discharge, including on aquatic ecosystem health and mahinga kai,contact recreation users and Māori customary use, and as required by Policy WH.P12
S186.129	8 Whaitua Te Whanganui-a-Tara	Rule WH.R9: Stormwater from a local authority or state highway network- restricted discretionary activity.	Support	Airport	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S186.130	8 Whaitua Te Whanganui-a-Tara	Rule WH.R10: Stormwater from new state highways- discretionary activity.	Support	Not stated	Not stated
S186.131	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Support	Not stated	Not stated
S186.132	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Support	Not stated	Not stated
S186.133	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S186.134	8 Whaitua Te Whanganui-a-Tara	Rule WH.R14: Wastewater network catchment discharges - restricted discretionary activity.	Support	Not stated	Not stated
S186.135	8 Whaitua Te Whanganui-a-Tara	Rule WH.R15: Existing wastewater discharges from a treatment plant - discretionary activity.	Support	Not stated	Not stated
S186.136	8 Whaitua Te Whanganui-a-Tara	Rule WH.R16: All other discharges of wastewater - non-complying activity.	Support	Not stated	Not stated
S186.137	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Neutral	Not stated	Not stated
S186.138	8 Whaitua Te	Rule WH.R24: Earthwork	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	s - restricted discretionary activity.			
S186.139	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Neutral	Not stated	Not stated
S186.140	12 Schedules	Schedule A: Outstanding water bodies	Support	Not stated	Not stated
S186.141	12 Schedules	Schedule A2: Lakes with outstanding indigenous ecosystem values.	Support	Not stated	Not stated
S186.142	12 Schedules	Schedule F: Ecosystems and habitats with significant indigenous biodiversity values.	Support	Not stated	Not stated
S186.143	12 Schedules	Schedule F1: Rivers and lakes with significant	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		indigenous ecosystems.			
S186.144	12 Schedules	Schedule F2a: Significant habitats for indigenous birds in rivers.	Support	Not stated	Not stated
S186.145	12 Schedules	Schedule F2b: Significant habitats for indigenous birds in lakes.	Support	Not stated	Not stated
S186.146	12 Schedules	Schedule F2c: Significant habitats for indigenous birds in the coastal marine area.	Support	Banded dotterl have been known to breed in the Palmer Head to Lyall Bay area.	Not stated
S186.147	12 Schedules	Schedule F4: Sites with significant indigenous biodiversity values in the coastal	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		marine area.			
S186.148	12 Schedules	Schedule F5: Habitats with significant indigenous biodiversity values in the coastal marine area.	Support	Not stated	Not stated
S186.149	12 Schedules	Schedule 27: Freshwater Action Plan requirements.	Support	Not stated	Not stated
S186.150	12 Schedules	A Freshwater Action Plans	Support	Not stated	Not stated
S186.151	12 Schedules	A1 Purpose	Support	Not stated	Not stated
S186.152	12 Schedules	A2 Freshwater Action Plans required in Whaitua Te Whanganui-a-Tara.	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S186.153	12 Schedules	B Freshwater Action Plan requirements.	Support	Not stated	Not stated
S186.154	12 Schedules	B1. Principles.	Support	Not stated	Not stated
S186.155	12 Schedules	B2. General Content.	Support	Not stated	Not stated
S186.156	12 Schedules	B3 Necessary actions.	Support	Not stated	Not stated
S186.157	12 Schedules	C. Freshwater Action Plans in Whaitua Te Whanganui-a-Tara	Support	Not stated	Not stated
S186.158	12 Schedules	D Freshwater Action Plans in Te Awarua-o-Porirua Whaitua	Support	Not stated	Not stated
S186.159	12 Schedules	Schedule 28: Stormwater Contaminant Treatment.	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S186.160	12 Schedules	Table 1: Target load Reductions for Copper and Zinc	Support	Not stated	Not stated
S186.161	12 Schedules	Table 2: Additional Devices and Specified Load Reductions for Copper and Zinc	Support	Not stated	Not stated
S186.162	12 Schedules	Schedule 29: Stormwater Impact Assessments.	Support	Not stated	Not stated
S186.163	12 Schedules	Schedule 30: Financial Contributions.	Support	Not stated	Not stated
S186.164	12 Schedules	A Context	Support	Not stated	Not stated
S186.165	12 Schedules	B Purpose	Support	Not stated	Not stated
S186.166	12 Schedules	C Definition of an Equivalent	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Household Unit			
S186.167	12 Schedules	D Calculation of level of contribution	Support	Not stated	Not stated
S186.168	12 Schedules	Table D1. Financial contribution calculations for residential greenfield development	Support	Not stated	Not stated
S186.169	12 Schedules	Tale D2. Financial contribution calculations for non-residential greenfield development and new roads/state highways	Neutral	Not stated	Not stated
S186.170	12 Schedules	E Use	Support	Not stated	Not stated
S186.171	12 Schedules	Schedule 31: Stormwate	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		r Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.			
S186.172	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Support	Not stated	Not stated
S186.173	12 Schedules	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Support	Not stated	Not stated
S186.174	12 Schedules	A Purposes of the Erosion and Sediment Management Plan	Support	Not stated	Not stated
S186.175	12 Schedules	C Requirements of the	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Erosion and Sediment Management Plan			
S186.176	12 Schedules	C1 Contents of the Erosion and Sediment Management Plan	Support	Not stated	Not stated
S186.177	12 Schedules	D Amendment of Erosion and Sediment Management Plan	Support	Not stated	Not stated
S186.178	12 Schedules	A Purposes of the Erosion and Sediment Management Plan	Support	Not stated	Not stated
S186.179	12 Schedules	B Management objectives	Support	Not stated	Not stated
S186.180	12 Schedules	C Requirements of the Erosion and	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Sediment Management Plan			
S186.181	12 Schedules	C1 Contents of the Erosion and Sediment Management Plan	Support	Not stated	Not stated
S186.182	12 Schedules	C2 Certification of the Erosion and Sediment Management Plan	Support	Not stated	Not stated
S186.183	12 Schedules	D Amendment of Erosion and Sediment Management Plan	Support	Not stated	Not stated
S186.184	12 Schedules	A Certification requirements under the Resource Management (Freshwater Farm	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Plans) Regulations 2023.			
S186.185	12 Schedules	C Content of a farm environment plan.	Support	Not stated	Not stated
S186.186	12 Schedules	D Risk assessment and mitigation to address risk.	Support	Not stated	Not stated
S186.187	12 Schedules	Table D1. Financial contribution calculations for residential greenfield development	Support	Not stated	Not stated
S186.188	12 Schedules	E Erosion Risk Treatment Plan.	Support	Not stated	Not stated
S186.189	12 Schedules	F Small stream riparian programme.	Support	Not stated	Not stated
S186.190	13 Maps	Map 27: Sites with significant indigenous biodiversity values in	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		the coastal marine area (Schedule F4) Insert 2: (Wellington Harbour).			
S186.191	13 Maps	Map 77: Habitats of nationally threatened freshwater species - Te Awarua-o-Porirua and Te Whanganui-a-Tara (Schedule F1).	Support	Not stated	Not stated
S186.192	13 Maps	Map 79: Part freshwater management units and target attribute state sites (rivers) - Te Whanganui-a-Tara.	Support	Not stated	Not stated
S186.193	13 Maps	Map 80: Part freshwater	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		management units and target attribute state sites (lakes) - Te Whanganui-a-Tara.			
S186.194	13 Maps	Map 83: Coastal water management units - Te Whanganui-a-Tara.	Support	Not stated	Not stated
S186.195	13 Maps	Map 85: Primary contact sites - Te Whanganui-a-Tara.	Support	Not stated	Not stated
S186.196	13 Maps	Map 87: Unplanned greenfield areas - Wellington City Council.	Support	Not stated	Not stated

S210 Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S210.001	General comments	General comments - unplanned greenfield development	~~Amend~~ Oppose	Submitter has concerns as to zoning of their land and considers the zoning as 'unplanned greenfield areas' is contrary to previous the previous stance taken by GWRC and UHCC. The submitter notes they have invested time and money on expert assessments to date to support the rezoning of their land which have demonstrated the suitability of its land for residential and mixed use activities, and the economic and social benefits to the wider community, including affordable housing, recreational opportunities, and ecological enhancement of important areas. Submitter opposes their land being identified 'unplanned greenfield areas' on Planning Map 88 and being subject to the 'unplanned urban development' provisions of PC1, which include prohibited activity rules associated with stormwater discharges. Considers it is appropriate based on the planning history of the land for it to be included in the 'planned/existing urban area' notation on Planning Map 88.	Seeks GWRC reclassify submitters land in Pinehaven/Silverstream (as shown on Map 1 in Appendix A with legal descriptions provided in Appendix B - refer to original submission) from 'unplanned greenfield areas' to 'Planned/existing urban area'.
S210.002	General comments	General comments - unplanned greenfield development	Oppose	Opposes and seeks removal from PC1 all provisions that provide for unplanned greenfield development. The submitter considers the approach to prohibiting unplanned greenfield development (Policy WH.P2); avoiding all new stormwater discharges from unplanned greenfield development (Policy WH.P.16); and the subsequent prohibiting of stormwater from new unplanned greenfield development (Rule WH.R13) is overly restrictive, unwarranted and a misuse of the prohibited activity category. In particular the submitters are concerned that: Areas shown on Maps 86 - 89 are extensive in area	Seeks definition of 'unplanned greenfield development' and all reference to 'unplanned greenfield development' and 'unplanned greenfield areas' be deleted from PC1 provisions, and for GWRC to rely on the PC1, existing NRP, and district plan provisions to address the effects of future greenfield development outside of existing urban areas.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				and will affect an unidentified number of resource users unlikely to have been properly consulted (although it is noted feedback from consultation as part of the s.32 evaluation was unsupportive of the prohibited activity status of greenfield development within unplanned greenfield development areas - Para. 53; page 13 s.32 evaluation report); The costs and benefits/effectiveness and efficiency evaluation of adopting this prohibitive approach included in the s.32 evaluation report is general in nature and fails to identify and assess the extent the NPS-UD will be implemented (including being contrary to the intent of Objectives 2 and 6 and Policy 8), the costs and delays to resource users caused by the requirement to undertake a dual plan change process (there is no provision in the RMA for a dual private plan change process), and the ability of councils to respond to the housing needs of the region; Prohibiting unplanned greenfield development and requiring the resource user to go through two plan changes to change both the district and regional plans is a misuse of the prohibited activity category which is intended to be used with care and where the effects are easily identifiable and discrete - in this case the effects of the prohibited activity are not specified for any particular area, and the extent of the area does not warrant a blanket approach; Furthermore, there is no evaluation of reasons why another activity status (such as discretionary or non-complying) could be used for unplanned greenfield developments This approach would allow adverse effects of a particular proposal in a particular area to be considered, and the proposal declined if the effects did not meet the objectives and policies on the NRP; Adopting a plan change process to change the activity should not be used as an alternative to the	

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				resource consenting process, but this appears to be the approach taken in PC1; There are restrictions on when private plan change requests can be made and Council has discretion as to whether they reject those requests or not, including not meeting priorities and whether the matter had been considered within the last 2 years. (clause 25, schedule 1 RMA). There is no certainty that a private plan change process is available. The objectives of PC1 do not justify the avoidance and prohibited approach adopted in the policies and rules; The definition of 'unplanned greenfield development' includes a note that states unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time PC1 was notified on 30th October 2023 - this limitation does not recognise that there are submissions to the draft FDS and PC50 of the UHCC district plan (that is still going through a plan change process that could result in rezoning of submitters land) seeking areas to be rezoned residential beyond the 30th October date specified, or capture the UHCC IPI implementation of the MDRS. Furthermore, there is an inconsistent application of the definition of 'unplanned urban development' by local authorities (i.e. large lot residential and hill residential lots have been included in Wellington and Hutt City Council areas, but rural residential has been excluded from UHCC and Porirua City Council which has similar types of urban development outcomes.	
S210.003	General comments	General comments - plantation forestry	Amend	The submitter considers the NES-CF provides a consistent and clear process for forestry practitioners to manage forestry operations, including on sites susceptible to erosion. The submitter is concerned the provisions included in PC1 add additional layers of requirements in	Seeks the following: NES-CF is used as the basis of management of commercial forestry in the Wellington region and the rules restricting plantation (commercial) forestry rules are deleted; Correctly refer to the Resource Management (National

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				policies and rules that are more restrictive to the updated NES-CF that are unjustified and unwarranted, and not required to implement the objectives of the NRP or NPS-FW. Considers these additional provisions will cause additional costs and delays, and potential confusion around which rules need to be considered on site. The submitter has reviewed and considered the proposed changes and does not see the proposed standards helping to manage more effectively the resource management issues encountered with commercial forestry. PC1 also provides for additional management practices and documentation for erosion and sediment control processes which are not occurring within 10m of a water body on areas identified by GWRC as having highly erodible soil. The level of assessment under Schedule 34 is above and beyond what is required under the NES-CF and are onerous and unnecessary for managing commercial forestry resource management issue. The requirement to progressively reduce and cease plantation (commercial) forestry beyond the next harvest on the highest erosion risk land and then to provide an objective to restore and revegetate the site, with a presumably native permanent woody species, is also strongly opposed. The submitter considers prohibiting forestry activity after the last harvest and then dictating through the schedule to not be able to consider other land uses for the site is a totally inappropriate use of the plan making tools available to manage resource management issues. It is an over-reaction and does not take into account the costs and benefits of this change in land use and property rights of land owners who undertake a forestry business on the land. There appears to have been no consultation with the Region's forestry industry in development of these provisions despite the significant impact it will have on the industry, the submitter's own operator was	Environmental Standards for Commercial Forestry) Regulations 2017 (Updated 3 November 2023); Correctly refer to 'commercial forestry' to be consistent with the updated NES-CF; Correct the Note after Rule WH.R19 on page 98 to refer to the NES-CF.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				not consulted as well as many of its contracting crews. The submitter also notes there are also a number of definitions which incorrectly refer to the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017. This incorrect reference is used throughout the PC1 provisions. This name was changed to the Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2017 on 03 November 2023, by regulation 4 of the Resource Management (National Environmental Standards for Commercial Forestry) Amendment Regulations 2023. Furthermore the submitters note the term 'plantation forestry' is used throughout PC1 and is not defined. References to 'plantation forestry' in the NES-CF have been changed to 'commercial forestry' as part of the amendment regulations, and for consistency PC1 should reflect these changes. Finally, the submitters have identified that the 'Note' following Rule WH.R19 on page 98 of PC1 incorrectly references the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 instead of the Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2017 (updated November 2023).	
S210.004	General comments	General comments - plantation forestry	Amend	Submitter is concerned that a number of provisions of PC1 that relate to plantation (commercial) forestry and vegetation clearance are incorrectly allocated as Freshwater Planning Process (FPP) provisions. The submitter considers it is unclear how plantation (commercial) forestry activities in line with the NES-CF (2023) are allocated to the FPP. In particular, the submitter notes: The definition of Afforestation, Harvesting, Mechanical land preparation, Replanting,	Seek that definitions, policies and rules related to plantation (commercial) forestry covered by the NES-CF be removed from the FPP process

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Vegetation Clearance for the purpose of the plantation (commercial) forestry rules, that all come from the NES-CF (updated November 2023) but have been allocated to the FPP. The primary aim of these is regulations is forestry not freshwater; Policy WH.P28; Rules WH.R20; WH.R21 and WH.R22 controlling plantation (commercial) forestry are all allocated to the FPP process; Rules WH.R17; WH.R18 and WH.R19 relating to vegetation clearance are all allocated to the FPP process.	
S210.005	General comments	General comments - unplanned greenfield development	Not Stated	Notes the regional and district plans are required to give effect to the NPS-UD. Notes submitters land was identified as a growth area in the Wellington Regional Future Growth Framework (2021) but the draft FDS1 (PPC1 to the Natural Resources Plan) has not included site as a Future Growth Area. Notes submitters land has been identified as a future urban growth area since 2007 in the Upper Hutt District Plan but plan change 50 to the Upper Hutt District Plan did not include provisions to allow the development of the submitters land as a future growth area. Notes in the HCC Land Use Strategy 2016 - 2043 (LUS) the submitter's land is identified as a growth area. Notes the submitters land is identified in the UHCC Long Term Plan 2021 - 2031 (LTP) (adopted 2022) as a growth area and is recognised and accounted for in the planning for public infrastructure upgrades for growth planning purposes. In particular, Silverstream bridge replacement, and Pinehaven reservoir upgrades for water supply both required to facilitate increased population growth in the area.	Not Stated.
S210.006	2 Interpretation	Earthworks	Amend	Supports the exception to earthworks definition that adopts the definition 'earthworks' contained in the NES-PF for the purposes of the rules relating to	Seeks definition of 'earthworks' (subject to update to the new NES-CF) be retained as currently written.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				plantation (commercial) forestry, but notes NES-PF referred to has been superseded by the NPS-CF and seek for this updated NES-PF to be referenced in the definition.	
S210.007	2 Interpretation	Highest erosion risk land (plantation forestry)	Oppose	Opposes mapping of 'highest erosion risk land (plantation forestry)' and 'highest erosion risk land (woody vegetation)'. Notes the NES-CF uses a different erosion susceptibility classification tool that divides the NZ landscape into 4 erosion categories: green (low) and yellow (moderate) - land less likely to erode where commercial forestry activities are permitted (subject to conditions being met); Orange (high risk) and red (very high risk) - land more likely to erode where most forestry activities can't be carried out on red-zoned land without resource consent, and some activities such as earthworks also require consent on orange-zoned land. Using this classification the submitters land is zoned green and yellow on the Ministry of Primary Industries (MPI) mapping of areas, meaning forestry activity is permitted under the NES-CF subject to meeting conditions. This classification seems to be in direct conflict to the maps prepared by GWRC which include 'highest erosion risk land (plantation forestry)' over the submitters land. The submitter therefore questions why there is such a variation in the classification of their site, and consider it is more appropriate for commercial forestry on its land to be managed through the NES-CF. Considers the quality of the mapping is poor and difficult to tell where the areas shown on Maps 94 and 95 start and finish on the submitter's site due to the pixelation that occurs when zooming in on a particular area. This poor mapping quality needs to be resolved so land users are able to determine where these areas are on their property, and the	Seeks the following: The management of commercial forestry activities on the submitters land be undertaken in accordance with the erosion susceptibility classification tool and the requirements of the NES-CF; That these PC1 definitions and provisions be deleted or the NRP be amended to be consistent with and take the same approach as the NES-CF - a more restrictive approach is not justified; Mapping of 'highest erosion risk land (plantation forestry)' and 'highest erosion risk land (woody vegetation)' to be improved to a higher quality so that when zooming in on a site on the map a resource user can easily determine where the relevant areas are located on a site.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				poor mapping could cause GWRC compliance issues at a later date. Considers it not possible for individual submitters to determine the extent their land is affected and to make a submission, this mapping should be redone and that aspect of the plan re-notified.	
S210.008	2 Interpretation	Hydrological control	~~Amend~~ Oppose	Concerned with definition suggesting management of stormwater would be "... in a way that replicates natural processes...' . Considers the reference to natural processes is inappropriate, and would seek the definition be amended to refer to 'hydraulic processes'.	The submitters seek the definition of hydrological control to be amended as follows: "The management of a range of stormwater flows and volumes, and the frequency and timing of those flows and volumes, from a site or sites into rivers, lakes, wetlands, springs, riparian margins, and other receiving environments in a way that replicates ~~natural processes~~ **hydraulic processes** for the purpose of reducing bank erosion, slumping, or scour, to protect freshwater ecosystem health and well-being."
S210.009	2 Interpretation	Impervious surfaces	Support	Not stated	Seeks definition of 'impervious surfaces' be retained as currently written.
S210.010	2 Interpretation	Stabilisation	Support	Not stated	Seeks definition of 'stabilisation' be retained as currently written.
S210.011	2 Interpretation	Stormwater treatment system	Support	Not stated	Seeks definition of 'stormwater treatment system' be retained as currently written.
S210.012	2 Interpretation	Unplanned greenfield development	Oppose	Considers the' Note' that includes reference to 30th October 2023 is inflexible and unnecessary and does not account for councils (such as UHCC) that may have a plan change going through the process that intends to rezone land to residential beyond that date, or for future plan changes, including the IPI UHCC plan change which was approved by Council on 23 November 2023.	Seeks deletion of unplanned greenfield development definition
S210.013	3 Objectives	Objective O18: Rivers, lakes, natural	Support	Supports intent of Objective O18	Retain O18 as notified

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		wetlands and coastal water are suitable for contact recreation and Māori customary use.			
S210.014	3 Objectives	Objective O19: Biodiversity, aquatic ecosystem health and mahinga kai in fresh water bodies and the coastal marine area are safeguarded.	Support	Supports intent of Objective O19	Retain O19 as notified
S210.015	3 Objectives	Objective O25: Outstanding water bodies identified in Schedule A (outstanding water bodies)	Amend	The submitter notes the new note states Tables 3.4, 3.5, 3.6 and 3.8 do not apply to Whaitua Te Whanganui-a-Tara but it is noted Tables 3.1 and 3.3 also have the symbol indicating these tables also do not apply to the Whaitua Te Whanganui-a-Tara, and the submitters consider these tables should also be referenced in Objectives O25 and O28.	Amend Objective O25 to include reference to Tables 3.1 and 3.3

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and their significant values are protected and restored.			
S210.016	3 Objectives	Objective O28: Ecosystems and habitats with significant indigenous biodiversity values are protected from the adverse effects of use and development, and where appropriate restored to a healthy functioning state including as defined by Tables 3.4, 3.5, 3.6, 3.7 and 3.8.	Amend	The submitters note the new note states Tables 3.4, 3.5, 3.6 and 3.8 do not apply to Whaitua Te Whanganui-a-Tara but it is noted Tables 3.1 and 3.3 also have the symbol indicating these tables also do not apply to the Whaitua Te Whanganui-a-Tara, and the submitters consider these tables should also be referenced in Objectives O25 and O28.	Amend Objective O28 to include reference to Tables 3.1 and 3.3

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S210.017	4 Policies	Policy P30: Biodiversity, aquatic ecosystem health and mahinga kai.	Support	Supports intent of Policy P30	Retain P30 as notified
S210.018	4 Policies	Policy P78: Managing point source discharges for aquatic ecosystem health and mahinga kai.	Support	Supports effects management approach of Policy P78	Retain P78 as notified
S210.019	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Support	Supports Clause (a) that proposes to investigate financial support and rates relief options for accelerating retirement/revegetation of pastoral and plantation (commercial) forestry land uses. The submitter notes as currently written, PC1 brings in changes that prohibits intended future use (residential) and prevents continuation of the existing use of production forestry for parts of the submitters site. The submitter considers as a result of the introduction of PC1 provisions, their land will have little value and rates relief/financial support is appropriate, however they do note that in order for relief to be effective, relief is also necessary from District Council rates.	Retain M44 as notified or update to include reference to investigating the extension of rates relief to District Council rates.
S210.020	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater	Amend	Notes aspirational intent of objective to progressively improve the health of freshwater bodies (and the coastal marine area) and for them to be in a wai ora state by 2100. While generally supporting intent of the objective, the submitters	Amend WH.O1 to apply to natural freshwater bodies to avoid the all-inclusive nature of the intent which has unintended consequences.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.		note the objective is all-inclusive (relates to the health of all freshwater bodies) and the wai ora state requires all freshwater bodies to have planted margins which may not be physically or legally (due to property rights) possible. The submitter notes that the term 'freshwater bodies' is not defined in the RMA or any of the relevant planning instruments (NPS-FW; NES-FW; RPS; NRP), but freshwater is defined in the RMA as "means all water except coastal water and geothermal water". This means that the all-inclusive intent of Objective WH.O1 will apply freshwater bodies (such as roadside channels and man-made drains that convey freshwater) which is considered impracticable and unnecessary. The submitters consider the objective be amended to apply to natural freshwater bodies to avoid unintended consequences.	
S210.021	8 Whaitua Te Whanganui-a-Tara	Objective WH.O2: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvem	Support	Notes and supports the more focused intent of the objective on the health and wellbeing of groundwater, rivers and natural wetlands within the Whaitua. Notwithstanding this support, there are outcomes (such as river and erosion processes including bank stability (Clause (b)), and the extent and condition of indigenous riparian vegetation (Clause (c)) are to be increased or improved that do not appear to have any clear or acceptable targets that these matters can be assessed against. Questions what level of acceptance targets are intended to be used?	Retain WH.O2 as notified but consider identifying acceptable targets for matters not covered by TAS

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		ent towards wai ora.			
S210.022	8 Whaitua Te Whanganui-a-Tara	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	~~Amend~~ Oppose	Notes intent of the objective to 'protect' groundwater dependent ecosystems (Clause (b)) and ecosystems in connected surface water bodies (Clause (c)), and 'avoid' aquifer consolidation (Clause (f)). However oppose these approaches as they lead to restrictive and unnecessary restrictions in policies and rules to appropriately implement the objective. Consider an effects management approach as per the NPS-FM is more appropriate and provides a balanced response, and seek an amendment to these clauses to ensure consistency within the objective with Clauses (a), (d) and (e) and other objectives (such as Objective WH.O9).	Seeks the following amendments to Objective WH.O6 (or similar wording): i. Clause (b) be amended to read: "~~protect~~ **ensure that** groundwater dependent ecosystems **are maintained or improved where degraded"** ii. Clause (c) be amended to read: "~~protect~~ **ensure that** ecosystems in connected surface water bodies are **maintained or improved where degraded,** and" iii. Clause (f) be amended to read: "avoid **or minimise** aquifer consolidation"
S210.023	8 Whaitua Te Whanganui-a-Tara	Objective WH.O9: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Support	Supports approach to maintain or improve water quality, habitat, water quantity and ecological processes of rivers, and the reference to 'at least maintaining" TAS in Clauses (b) and (c).	Retain WH.09 as notified
S210.024	8 Whaitua Te Whanganui-a-Tara	Policy WH.P1: Improvement of aquatic ecosystem health.	~~Amend~~ Oppose	Opposes Policy WH.P1 as it does not accurately reflect intent of the objectives being to maintain the aquatic ecosystem health where TAS are met, and improving them where TAS is not currently met. Considers the objectives provide more flexibility than the 'improve' approach in the policy.	Seeks the following amendments to Policy WH.P1 to better reflect and implement the objectives (or similar wording): "Improvement of aquatic ecosystem health Aquatic ecosystem health will be **maintained or** improved **where relevant target attribute state is not met** by: (a) progressively reducing the load or concentration of

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					contaminants, particularly sediment, nutrients, pathogens and metals, entering water **where relevant target attribute state is not met,** and (b) **maintaining or** restoring habitats **where relevant target attribute state is not met,** and (c) **maintaining or** enhancing the natural flow regime of rivers and managing water flows and levels ,~~strong~~**>where relevant target attribute state is not met**, including where there is interaction of flows between surface water and groundwater, and (d) co-ordinating and prioritising work programmes in catchments that require changes to land use activities that impact on water."
S210.025	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	~~Amend~~ Oppose	~~Seeks the following amendments to Policy WH.P1 to better reflect and implement the objectives (or similar wording):~~ ~~"Improvement of aquatic ecosystem health Aquatic ecosystem health will be maintained or improved where relevant target attribute state is not met by:~~ ~~(a) progressively reducing the load or concentration of contaminants, particularly sediment, nutrients, pathogens and metals, entering water where relevant target attribute state is not met, and~~ ~~(b) maintaining or restoring habitats where relevant target attribute state is not met, and~~ ~~(c) maintaining or enhancing the natural flow regime of rivers and managing water flows and levels where relevant target attribute state is not met, including where there is interaction of flows between surface water and groundwater, and (d) co-ordinating and prioritising work programmes in catchments that require changes to land use activities that impact on water."~~ Considers objectives do not require such a restrictive approach and do not consider the dual process for unplanned greenfield development is	Amend Clause (a) to read (or similar wording): **"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"; Additional thought be given to clearly identifying level of acceptable targets for these matters that are not cover by the TASs, as identified above in relation to Objective WH.O2 Either delete or amend Clause (f) to read: ~~requiring the active management~~ **adopting best practice principles and management** of earthworks, forestry, cultivation and vegetation clearance activities; and Either delete or amend Clause (g) to read: **"adopting best practice principles and management of** soil conservation treatment, ~~including revegetation with woody vegetation~~ of land with high erosion risk,".

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				warranted as there is no dual plan change process in the RMA.	
S210.026	8 Whaitua Te Whanganui-a-Tara	Policy WH.P4: Achievement of the visual clarity target attribute states.	Support	Supports proposed approach to achieving visual clarity targets, relative to the site at the Hutt River at Boulcott only.	Retain proposed visual clarity target at Boulcott
S210.027	8 Whaitua Te Whanganui-a-Tara	Policy WH.P6: Cumulative adverse effects of point source discharges.	~~Amend~~ Oppose	Oppose approach in the policy to avoiding the cumulative effects of point source discharges as this policy leads to overly restrictive rules and creates uncertainty for renewal of existing consents as the timeframe referenced in Clause (c)(ii) is not specified. Seeks policy be amended to provide a more flexible effects management approach consistent with objectives and other policies in PC1.	Seeks the following amendments to Policy WH.P6: Amend the policy to read (or similar wording): "The cumulative adverse effects of point source discharges, excluding stormwater network and wastewater discharges, to water are avoided **or minimised** and ..." Clarify the programme for timeframes and programme for the renewal of existing consents in Clauses (b) and (c).
S210.028	8 Whaitua Te Whanganui-a-Tara	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Support	Supports Policy WH.P9	Retain WH.P9 as notified
S210.029	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwate	Support	Supports Policy WH.P10	Retain WH.P10 as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		r discharges .			
S210.030	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Support	Supports Policy WH.P14	Retain WH.P14 as notified
S210.031	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Support	Supports Policy WH.P15	Retain WH.P15 as notified
S210.032	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Oppose	Oppose policy and in particular the 'avoid' approach which directly leads to the prohibited activity Rule WH.R13. The submitter opposes the use of prohibited activity rules for the reasons given in PART ONE of the original submission. The submitters do not consider the implementation of the PC1 objectives requires or justifies the avoidance as the only option for managing stormwater discharges from unplanned greenfield development, and the subsequent prohibited activity rule approach. As per Submission Point #2 in the original submission, the submitter seeks the policy be deleted from PC1 as it is not necessary to	Delete Policy WH.P16 or amend as follows (or similar wording):"~~Avoid~~ **Ensure** all new stormwater discharges from unplanned greenfield development **avoid or minimise any adverse effects** where the discharge will enter ... "

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				implement the objectives. Alternatively, if deletion is not accepted, submitters seek an amended to the policy to provide a more flexible effects management approach consistent with the objectives and other policies in PC1.	
S210.033	8 Whaitua Te Whanganui-a-Tara	Policy WH.P17: General wastewater policy to achieve target attribute states and coastal objectives.	Support	Supports WH.P17	Retain WH.P17 as notified
S210.034	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Oppose	Oppose intent of Policy WH.P28 that has direct relevance to their commercial forestry operations, and results in the introduction of prohibited activity Rule WH.R22. As previously discussed in Submission Point #3 of the original submission, the submitter seeks commercial forestry activities to be managed through NES-CF which they consider are appropriate and justified. The submitter also raises the question of the differences in the mapping of erosion risk land in Submission Point #5 of the original submission and the quality of the mapping which is poor and is difficult to tell where the high erosion risk land (plantation (commercial) forestry) areas shown on Map 95 start and finish on the submitter's site due to the pixelation that occurs when zooming in on a particular area. Oppose Clause (c) that seeks to prohibit new and continuing (after harvesting) of plantation (commercial) forestry on highest erosion risk land (plantation forestry), which leads to prohibited activity Rule WH.R22. The submitters note the	Mapping of 'highest erosion risk land (plantation forestry)' be deleted, or amended and improved to a higher quality so that when zooming in on the map a resource user can easily determine where the areas are located on a site; ~~or~~ Deletion of Clause (c).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				intent of Clause (c) is carried through into Schedule 34, as discussed later in this submission. Oppose the use of prohibited activity rules for the reasons given in PART ONE of the original submission. The submitters do not consider the implementation of the PC1 objectives requires or justifies the use of a prohibited activity rule approach and that the provisions of the NES, NPS-CF are more appropriate.	
S210.035	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Support	Supports the managing of the risk of sediment discharges from earthworks using best practise management which is considered reasonable and pragmatic.	Retain WH.P29 as notified
S210.036	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Support	Supports the standards for managing the discharge of sediment from earthworks over an area greater than 3,000m2 which are considered reasonable and pragmatic.	Retain WH.P30 as notified
S210.037	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose	Opposes winter shut down period for earthworks over 3,000m2 as the requirements are onerous and will delay developments, result in unnecessary costs and are not required with the standards set in Policy WH.P30 and included in the rules (note the submitter opposes the shut down period being included in Rule WH.R24 below). Considers there does not appear to be sufficient rationale to justify shut down period and notes winter works are totally appropriate to be undertaken if the soil type provides for this and sufficient management of earthworks controls are provided to manage effects, and or during construction a contractor has demonstrated they can work effectively in these conditions and the project requires works in this period. This is regularly based on the performance	Delete WH.P31

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				of a contractor, winter works are able to be undertaken and in many cases is allowed for and assessed as being acceptable in resource consent applications. This operational performance standard that is normally site specifically assessed should be deleted as a policy.	
S210.038	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Support	Supports Rule WH.R2	Retain WH.R2 as notified
S210.039	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Support	Supports Rule WH.R3	Retain WH.R3 as notified
S210.040	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	~~Amend~~ Oppose	Supports the permitted activity status for stormwater discharges from new and redeveloped impervious surfaces less than 1,000m2, but opposes the exclusion of 'unplanned greenfield development' included in the rule. Considers reference to unplanned greenfield development unnecessary and inappropriate as the rule is clearly focused on new or redevelopment of existing impervious surfaces, which is reasonable and pragmatic. Concerned that Clause (a) seems to restrict all impervious area to less than 1000m3 for the entire site for all time which is considered onerous and overly limiting. Such an approach does not account	Retain Rule WH.R5 be retained as notified, subject to the deletion of the reference to 'unplanned greenfield development' and the following amendment to Clause (a): "the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m2 **on an existing lot or future subdivided lot over a 12 month period** (baseline property existing impervious area as at 30 October 2023) and...".

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				for a large site being subdivided into lots, or if the impervious surfaces are historical.	
S210.041	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	~~Amend~~ Oppose	While the submitters support the controlled activity status for stormwater discharges from new and redeveloped impervious surfaces greater than 1,000m2 but less than 3,000m2, they oppose the exclusion of 'unplanned greenfield development' included in the rule. Reference to unplanned greenfield development is unnecessary and inappropriate as the rule is clearly focused on new or redevelopment of existing impervious surfaces, which is reasonable and pragmatic. In addition, the submitters are concerned that Clause (a) seems to restrict all impervious area to between 1000m2 and 3,000m2 for the entire site for all time which is considered onerous and overly limiting. Such an approach does not account for a large site being subdivided into lots, or if the impervious surfaces are historical.	Retain Rule WH.R6 as notified, subject to the deletion of the reference to 'unplanned greenfield development' and the following amendment to Clause (a): "the proposal involves the creation of new, or redevelopment of existing impervious areas between 1,000m2 and 3,000m2 **on an existing lot or future subdivided lot over a 12 month period** (baseline property existing impervious area as at 30 October 2023) and.."..
S210.042	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Amend	Supports the discretionary activity status for stormwater discharges from new and redeveloped impervious surfaces that are not permitted or controlled which is considered reasonable and pragmatic, but oppose the reference to the prohibited activity Rule WH.R13 relating to 'unplanned greenfield development' which they are seeking deletion of. Rule WH.R11 would need to be amended, as a consequential change, should GWRC accept the submitters request and delete Rule WH.R13.	Retain WH.R11 as notified subject to deletion of reference to Rule WH.R13
S210.043	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-	~~Amend~~ Oppose	Considers non-complying activity status for all other stormwater discharges that do not comply with the various rules listed is onerous and unnecessary. Considers a discretionary activity status is appropriate for non-compliance with one or more of the various conditions and matters of discretion as the adverse effects of that part of the activity that cannot comply can be identified and assessed, and	Re-categorise WH.R12 to discretionary and delete reference to WH.R13

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		complying activity.		the application can be declined if the adverse effects are inappropriate and cannot be mitigated. In addition, the submitter opposes the reference to the prohibited activity Rule WH.R13 relating to 'unplanned greenfield development' which they are seeking deletion of. Rule WH.R12 would need to be amended, as a consequential change, should GWRC accept the submitters request and delete Rule WH.R13.	
S210.044	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	The submitters strongly oppose Rule WH.R13 and seek it be deleted in its entirety. As discussed in PART ONE of the original submission, including the prohibited activity status is onerous and not justified by the objectives included in PC1. Any adverse effects of stormwater from a new unplanned greenfield development not in the identified future growth areas can be addressed through the stormwater rules in proposed PC1 for new greenfield developments and a non-complying activity rule if the conditions and standards in the proposed rules are not met. It is also inconsistent with the NPS-UD. This amendment sought allows for stormwater effects to be properly considered and controlled.	Delete WH.R13 and introduce non-complying activity rule for activities that cannot comply with one or more conditions and standards in proposed rules.
S210.045	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity.	Amend	Supports the permitted activity status for vegetation clearance on highest erosion risk land (woody vegetation) subject to better mapping as addressed in Submission Point #3 in the original submission.	Retain WH.R17 as notified subject to better mapping as addressed in Submission Point #3 of the original submission
S210.046	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest	Oppose	Opposes the controlled activity status for vegetation clearance on highest erosion risk land (woody vegetation) of more than a total area of 200m2 per property in any consecutive period. Considers the 200m2 area is far too restrictive and impracticable	Exempt normal plantation (commercial) forestry operation from Rule WH.R18

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		erosion risk land - controlled activity.		and does not recognise planation forestry operations that require regular maintenance to cut down trees that potentially affect the slope stability and access of logging tracks. Normal operations also include clearance of 2m strips on either side of the logging track to maintain access. Oppose the need for controlled activity resource consents for these normal commercial forestry maintenance operations, noting they are controlled and managed under the NES-CF and seek an exemption from Rule WH.R18.	
S210.047	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance - discretionary activity.	Support	Supports the discretionary activity status for vegetation clearance on highest erosion risk land (woody vegetation) that do not comply with one or more of the conditions of Rules WH.R17 and WH.R18.	Retain WH.R19 as notified
S210.048	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Oppose	Oppose the controlled activity status for plantation (commercial) forestry not on high erosion risk land (pasture) or highest erosion risk land (pasture) subject to the conditions and matters of control listed as they consider the matters being provided for by the rule are already appropriately controlled through the NES-CF, which has just been through a review process and has been updated accordingly. The submitters do not consider there is any justification for PC1 addressing these matters as this adds a further layer of unnecessary bureaucracy and seek the rule to be deleted in its entirety. Should GWRC decline this submission point, would seek Rule WH.R20 to be amended to be consistent with, and not more restrictive than, the NES-CF. Also seek the better mapping as addressed in Submission Point #3 of the original submission, and the submitter is opposed to this rule being allocated to the FPP process given that it does not directly	Delete Rule WH.R20; or as an alternative if it is retained; Amend Rule WH.R20 to be consistent with, and not more restrictive than, the provisions of the NES-CF; and address the mapping issues identified in Submission Point #3 of the original submission, and Remove Rule WH.R20 from the allocation of the provision from the FPP

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				relate to freshwater and is relevant to Forestry NPS and NPS-IB should properly be part of the schedule 1 process.	
S210.049	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry - discretionary activity.	Oppose	Oppose the discretionary activity status for plantation (commercial) forestry that do not comply with one or more of the conditions of Rule WH.20. Consider the matters being provided for by the rule are already appropriately controlled through the NES-CF, which has just been through a review process and has been updated accordingly. Do not consider there is any justification for PC1 addressing these matters as this adds a further layer of unnecessary bureaucracy and seek the rule be deleted in its entirety. Should GWRC decline this submission point, seek the activity status for Rule WH.R21 be changed to restricted discretionary activity, with the matters of discretion restricted to the one or more conditions of Rule WH.R20 that cannot be met. The rule should be amended to be consistent with, and not more restrictive than, the NES-CF. As discussed in Submission Point #4 of the original submission, the submitter is also opposed to this rule being allocated to the FPP process given that it does not directly relate to freshwater and is relevant to Forestry NPS and NPS-IB should properly be part of the schedule 1 process.	Delete Rule WH.R21; or as an alternative and if it is retained; Amend the activity status of Rule WH.R21 to restricted discretionary activity, with the matters of discretion restricted to the one or more conditions of Rule WH.R20 that cannot be met, and to be consistent with, and not more restrictive than, the provisions of the NES-CF; and Remove Rule WH.R20 from the allocation of the provision from the FPP
S210.050	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.	Oppose	Opposes Rule WH.R22. As discussed in PART ONE of the original submission, including the prohibited activity status is onerous and not justified by the objectives included in PC1, and any adverse effects of a plantation (commercial) forestry can be considered through a the NESCF provisions, and such an onerous rule will adversely affect the viability of forestry industry in the Region. Considers this approach is not justified, there has been no consultation or engagement with industry and little evidential basis in the s32 to support this approach.	Delete WH.R22

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				There also appears to be little consideration of the need to plant slopes to prevent erosion and the cost of doing so, without a return which will impose a significant burden on submitters. Seek the deletion of Rule WH.R22 in its entirety.	
S210.051	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Support	Support Rule WH.23.	Retain WH.23 as notified
S210.052	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Oppose	Supports the restricted discretionary activity status for earthworks and associated discharges subject to the conditions and matters of discretion listed which are considered reasonable and pragmatic. Oppose shut down period for earthworks included condition (b) and matter of discretion (8) restricting winter works and preparation for closedown for reasons outlined in Submission Point #29 of the original submission relating to Policy WH.P31.	Seeks intent and wording of Rule WH.R24 be retained as written, except for the deletion of Clause (b).
S210.053	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Oppose	Considers non-complying activity status for earthworks that do not comply with discretionary activity Rule WH.R24 onerous and unnecessary and will mean that consents where effects can be effectively managed, will not meet the threshold test and cannot be considered for consent. Consider a discretionary activity status is appropriate for a non-compliance with one or more of the conditions and matters of discretion as the adverse effects of that part of the activity that does not comply can be identified and assessed, and the application can be declined if the adverse effects are inappropriate and cannot be mitigated.	Recategorize WH.R25 from non-complying to a discretionary activity
S210.054	12 Schedules	Schedule 34: Plantation Forestry Erosion	Oppose	Consider Schedule s34 requirements for sediment management plans related to commercial forestry erosion overly onerous and would cause significant costs and potential delays in getting the management plan approved. Consider the sediment	Re-write the sediment erosion plan requirements to better reflect the management requirements of the NES-CF, and in particular delete 'Management Objective 4' in any re-write.

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		and Sediment Managem ent Plan.		management plan requirements should reflect the sediment management approach included in the NES-CF. Particularly opposes the requirements of Management Objective 4 which is implemented through Clause (c) of WH.P28.	

S049 Hamish Levak

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S49.001	General comment s	General comments - overall	Not Stated	Supports the New Zealand Farm Forestry Association Inc, and the Wellington Branch of the New Zealand Farm Forestry Associations' submissions.	Not stated
S49.002	General comment s	General comments - overall	Not Stated	Concern that proposed rules governing forestry in Plan Change 1 would render their forestry interests incapable of reasonable use and challenges the rule under Section 85 of the RMA.	Not stated
S49.003	General comment s	General comments - economic cost/impac t	Not Stated	Concern the costs and restrictions under the proposed new requirements will make small forestry operations uneconomic.	Not stated

S105 Hannah Bridget Gray (No2) Trust

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S105.001	2 Interpreta tion	2.2 Definitions	Amend	PC1 repeats 'woody vegetation' as a target state, concern around lack of proper definition and landowners being able to achieve this state. If term is defined in other legislation should be referenced properly.	Provide a clear definition of what constitutes "woody vegetation".

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S105.002	2 Interpretation	Earthworks	Amend	Drain and culvert maintenance often requires clearing sediment or earth - similar to installing a fence post but should not be considered earthworks.	For Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua only: The alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, and disturbance of land for the installation of fence posts or clearing of drains and culverts. Except that, for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20, 'earthworks' has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.
S105.003	2 Interpretation	Highest erosion risk land (pasture)	Amend	It is important that landowners understand the practical definition of 'highest erosion risk land (pasture). The definition provided refers to a specific map at a point in time. - does not enable landowners to accurately judge the impact of their impacts - does not enable farm environment plan certifiers to accurately evaluate yearly farm plans if the GWRC map is not up to date. -creates a reliance on GWRC re-mapping activities - There is also a significant time lag between landowners action and results.	Provide a clear definition of what Highest erosion risk land (pasture) is rather than referring to a point in time map.
S105.004	2 Interpretation	Impervious surfaces	Amend	Use of rain tanks, grey water reuse systems or any form of water collection and reuse should be encouraged as a responsible and environmentally friendly use of water rather than included in calculations as if it were environmentally damaging.	~~roof areas with rainwater collection and reuse~~ ~~any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)~~
S105.005	2 Interpretation	Redevelopment	Amend	Supports Porirua City Council's submission point on this provision.	Amend the definition in line with the Porirua City Council's submission point on this provision.
S105.006	2 Interpretation	Wastewater network catchment or sub-catchment	Amend	Supports Porirua City Council's submission point on this provision.	Amend the definition in line with the Porirua City Council's submission point on this provision.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S105.007	6 Other methods	Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Support	Not stated	Retain as notified
S105.008	6 Other methods	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Support	Not stated	Retain as notified
S105.009	6 Other methods	Method M43: Supporting the health of urban	Amend	Supports Porirua City Council's submission point on this provision.	Amend the definition in line with the Porirua City Council's submission point on this provision.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		waterbodies.			
S105.010	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Amend	Supports Porirua City Council's submission point on this provision. Strongly supports compliance incentives, such as relief rates for those actively making an effort, rather than regulatory enforcement.	Amend the definition in line with the Porirua City Council's submission point on this provision.
S105.011	6 Other methods	Method M41: Identifying and responding to degradation in freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Support	Not stated	Retain as notified
S105.012	6 Other methods	Method M45: Funding of wastewater and stormwater network upgrades	Amend	Supports Porirua City Council's submission point on this provision.	Amend the definition in line with the Porirua City Council's submission point on this provision.
S105.013	9 Te Awarua-	Policy P.P2:	Amend	Different stock types have different impacts on waterbodies and riparian margins. Consistency with	stabilising stream banks by excluding livestock (as defined in the Resource Management (Stock Exclusions) Regulations

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	Management of activities to achieve target attribute states and coastal water objectives.		National Regulations for stock exclusion (beef cattle and deer only on mapped low-slope land) should be maintained.	2020) from waterbodies and planting riparian margins with indigenous vegetation, and
S105.014	9 Te Awarua-o-Porirua Whaitua	Policy P.P8 Avoiding discharges of specific products and waste.	Amend	Current wording of point (b) would apply to every fenced paddock on every farm in the Wellington region and every house with a dog inside a fenced area, as the large majority of domesticated animals are by necessity confined to a fixed area.	Clarify when animals are considered confined
S105.015	9 Te Awarua-o-Porirua Whaitua	Policy P.P10: Managing adverse effects of stormwater discharges.	Amend	Supports, in principle, the encouragement of hydrological control and water-sensitive urban design measures. However, this policy seeks to mandate the use of controls without defining what acceptable hydrological controls are. Concerned that the policy is too vague, open to interpretation and likely open to challenge.	Develop a more comprehensive policy, including acceptable solutions and technical specifications.
S105.016	9 Te Awarua-o-Porirua Whaitua	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high	Amend	Supports Porirua City Council's submission point on this provision.	Amend the definition in line with the Porirua City Council's submission point on this provision.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		risk of erosion.			
S105.017	9 Te Awarua-o-Porirua Whaitua	Rule P.R16: Vegetation clearance on highest erosion risk land-permitted activity.	Amend	There are many pest plants in the region, and some such as Gorse should be considered carefully before removal due to acting as a nursery for native vegetation. Considers clarity is required about what is a pest and what is not.	A definition of pest plants is required.
S105.018	9 Te Awarua-o-Porirua Whaitua	Rule P.R25: Farming activities on properties of between 4 hectares and 20 hectares - permitted activity.	Support	Support in principle.	Retain as notified
S105.019	12 Schedules	B Management objectives	Amend	Maps 90-95 appear to have areas as small as ~5m wide. This could be covered by 1-2 trees and likely not more. It is unclear at what point a 25m2 spot would be considered 'revegetated'.	B. Management Objectives. Clarify how target states apply if the highest erosion risk land (pasture) areas are not contiguous
S105.020	12 Schedules	E Erosion Risk Treatment Plan.	Amend	Maps 90-95 appear to have areas as small as ~5m wide. Considers it is unreasonable to set a per-hectare target based on this, as a hectare is much larger than many of the areas identified as being at-risk. It should be based on the prorated/original total area identified as at risk.	E. Erosion Risk Treatment Plan (1). can reasonably be expected to reach canopy cover of at least 80% ~~per hectare~~ of the total area of any highest erosion risk land (pasture) within 10 years of being established, and

S045 Heather Blissett

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S45.001	General comments	General comments - overall	Not Stated	Requests the word "resource" be changed to "taonga" as the term resource implies something to be used as people see fit for financial gain.	Requests the word ~~"resource"~~ be changed to **"taonga"** as the term resource implies something to be used as people see fit for financial gain.
S45.002	General comments	General comments - overall	Not Stated	Requests mauri be added to restoring statements to reflect that we are restoring the mauri of the water (life energy).	Requests **mauri** be added to restoring statements to reflect restoring the mauri of the water (life energy).
S45.003	General comments	General comments - overall	Not Stated	Considers 2050 is not a reasonable date in the absence of any other date as water systems do not have that long (references Pg. 15)	Not stated
S45.004	General comments	General comments - water bodies	Not Stated	Suggests the Regional Emergency Plan be considered when thinking about water. Considers the intention to restore the mauri of the river should include being able to drink water from anywhere.	Not stated
S45.005	General comments	General comments - overall	Not Stated	Concerned the plan contains the right words and drawn-out action plans which won't prevent Te Awakairangi and Peatland dying along with the tributaries.	Not stated
S45.006	General comments	General comments - fresh water	Not Stated	Considers the statement "fish communities are resilient" to be too passive and that the term resilience suggests that fish communities could be forced to live in extremities of survival. (references Pg. 16)	Not stated
S45.007	General comments	General comments - water bodies	Not Stated	Questions whether there is an intent to restore the mauri of wetlands affected by human action. Supports restoring wetlands to what is known of the ecosystem, the water systems, and the life in and around it rather than using a measure from the date that humans destroyed them (references Pg. 18).	Not stated
S45.008	4 Policies	4.6 Biodiversity, aquatic	Not Stated	Submitter supports hydrology provision (a). Requests mauri be added to water quality provision	Requests mauri be added to water quality provision (b). Wording proposed is "Improve the **mauri** of the water"

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		ecosystem health and mahinga kai.		(b). Wording proposed is "Improve the mauri of the water"	
S45.009	5.2 and 5.3 Discharges to land and water and land use rules	Rule R104: Vegetation clearance on erosion prone land - permitted activity.	Not Stated	Questions this rule on the understanding the roots of vegetation hold land together.	Not stated

S212 Heather Phillips

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S212.001	General comments	General comments - overall	Not Stated	Considers sections are missing from the plan.	Not stated
S212.002	General comments	General comments – plantation forestry	Not Stated	Concern that PC1 does not mention wildfires as the likelihood is increasing through climate change and wildfires can have long-term effects, and there is no mitigation/planning/prevention of wildfires in the plan. Considers the plan promotes the continued plantation of pine trees (plantation forestry) on the highest erosion risk land for soil stabilisation, ignoring the greater danger of fire to the sediment retention requirements of the plan. Considers the Plan needs fire risk mitigation measures, including: Access to water (dams, tanks and spacing, size of same required) Setback requirements of ALL vegetation from powerlines Clear areas around houses and built up areas.	Not Stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Safety for escape routes Give knowledge of burn rates to tree species in New Zealand.	
S212.003	General comments	General comments - water bodies	Not Stated	Concern that PC1 does not cover waterway obstructions which can cause waterways to deviate and cause more sediment. A requirement should be made that when a waterway becomes obstructed by trees or growth it needs to be cleaned before the waterway if forced to deviate.	Not stated
S212.004	General comments	General comments - water bodies	Not Stated	Considers more extraction of gravels from the Hutt River needed to be undertaken to cope with the previous flood volumes and when the Hutt River breaches the stop banks much more than sediment will enter the Te Whanganui a Tara/Wellington Harbour. Considers planning for extreme events not evident in the plan but would be appropriate.	Not stated
S212.005	General comments	General comments - rural	Not Stated	Concern that pest animals and wild animals are not to be counted as stock units, despite grazing on local land and causing erosion damage. Concern that pests animals are not dealt with in plan change.	Not stated
S212.006	General comments	General comments - water bodies	Not Stated	Concern about lack of definition for river bed.	Add definition of river bed
S212.007	General comments	General comments - water bodies	Not Stated	Concern about lack of mention about the Whakatiki River/Little Wainui River.	Not stated
S212.008	General comments	General comments - stormwater management	Not Stated	Concern surrounding zinc contamination from water blasting of Transpower towers near waterways.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S212.009	General comments	General comments - fresh water	Not Stated	Concern about Trout protection within Plan Change 1 and suggests inclusion is at odds with other government department statements.	Not stated
S212.010	General comments	General comments - overall	Not Stated	Notes that fault lines will contribute to high levels of erosion and this cannot be regulated.	Not stated
S212.011	General comments	General comments - overall	Not Stated	Concern that PC1 is not easily understood and that it has lost the opportunity to tackle issues that contribute to sediment in rivers such as fires, obstructions and climate change. Concern that it has too much detail and lost sight of the bigger picture. Concern that increasing frequency of flood events will deter people from reenforcing rules once they have been swept away by nature i.e. fences.	Not stated

S226 Higgins Contractors Limited

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S226.001	General comments	General comments - stormwater management	Not Stated	Submission seeks clarity on matters relating to policy and rule frameworks for stormwater discharges to land/water, stormwater from impervious surfaces, and stormwater from high risk industrial or trade premises. Considers proposed policies/rules predominantly relate to discharges from larger sites or activities, such as municipal, state highway, or large urban area discharges, and does not provide alternate pathways for discharges from other sites, including smaller or industrial sites. Considers restriction of discharges entering the local authority network, to be a double-up of existing consenting requirements for local authorities under Schedule N of the NRP. Considers there should be a permitted activity pathway for discharge from any site, including	Not stated.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				industrial sites, to enter the local authority network provided discharge quality criteria are met. Consider impervious surface rules too restrictive with the 1,000m2 limit, and provide onerous requirements of stormwater management plans and impact assessments for smaller impervious areas, and for any impervious surface on 'high risk industrial' or 'trade premise' sites.	
S226.002	2 Interpretation	High risk industrial or trade premise	Amend	Considers definition too vague and could lead to misinterpretation. Suggests for activities not listed, intent of definition appears to be if risk of contaminants entering stormwater, HRITP rules are relevant. Concerns definition puts too much interpretation to the applicant, with risk of non-compliance if GWRC interpret the risk of the activity differently to applicants.	Amend definition of HRITP to be more specific and clearer in the intent. Provide exceptions for HRITPs for example where discharges are treated via an interceptor.
S226.003	5.1 Air quality rules	Rule R42: All other discharges - discretionary activity.	Support	Supports Rule R42 as it provides more clarity than existing rule	No relief sought.
S226.004	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	Not opposed to Policy WH.P2 in principle and supports fresh and coastal water quality improvements Opposes methods regulating discharge in policy including (c) requiring extensive hydrological controls for small sites and (d) imposing requirements for stormwater management strategies or impact assessments from all networks.	Remove the imposition of hydrological controls under (c), or amend wording to have regard to hydrological controls, rather than the imposition of such. Remove requirement of a reduction in contaminant load from stormwater network, or amend to include provisions or small site development discharges.
S226.005	8 Whaitua Te	Policy WH.P10:	Amend	Not opposed to WH.P10 and supports management of adverse effects on stormwater discharges but	Amend the Policy WH.P10 to have regard to matters (a) - (c)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	Managing adverse effects of stormwater discharges.		opposes methods regulating these discharges, including hydrological control via (b) and the onerous requirements which flow into the rules for stormwater from impervious surfaces.	
S226.006	8 Whaitua Te Whanganui-a-Tara	Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy.	Amend	Supports use of stormwater management strategies where relevant; i.e. municipal discharges, state highways, or large urban redevelopment. Opposes stormwater management strategies and imposition of requirements of Schedule 31 for smaller site redevelopment, including where discharges from smaller sites temporarily enter the local authority network.	Amend Policy WH.P13 so that it relates to municipal discharges, state highway discharges, or large urban development only.
S226.007	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Higgins support stormwater management from impervious surfaces in general but considers clarification is needed. Policy text considers new or redeveloped impervious surfaces from greenfield and existing urban areas only but rule framework from policy includes all sites. Intent of the policy and how this translates into rule framework for small non-urban sites is unclear.	New policy relating to stormwater from new and impervious surfaces from industrial or commercial sites.
S226.008	8 Whaitua Te Whanganui-a-Tara	Rule WH.R1: Point source discharges of specific contaminants -	Support	Supports discharge of specific contaminants as a prohibited activity unless treated by inceptor system	No relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		prohibited activity.			
S226.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Oppose	Supports conditions for discharges to land but opposes restrictions of rule under (b) as discharge from smaller sites should be permitted activity criteria is met, including via the local authority network under (b).	Remove (b) and stormwater to land is permitted provided conditions (c) to (e) which ensure water quality are met.
S226.010	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Oppose	Considers intent is unclear. If purpose is to improve surface water quality, it is unclear why (c) limits stormwater discharge to local stormwater networks instead of all discharges to surface water. Unclear why discharge directly into fresh/coastal water is permitted activity if certain water criteria is met but not into waters via the local authority network. If stormwater discharge quality standards are met under WH.R3, submitter consider the discharge should be allowed to enter the receiving surface or coastal water via the local authority network. Submitter considers exclusions in this rule for providing discharge to surface or coastal water which temporarily enters the local authority network should be made.	Limb (c) is removed, and stormwater to water is permitted provided conditions (d) to (h) are met, which ensures the discharge does not contain contaminants, limits the concentration of suspended solid input, and achieves water quality standards to not cause listed effects beyond the zone of reasonable mixing. Alternatively, the rule could be amended so that discharges which enter water via the local authority network be provided for as a permitted activity, subject to meeting the discharge quality conditions of the rule.
S226.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Oppose	Opposes rule pathway leading any HRITP (WH.R4) to Rule WH.R11 as a discretionary activity should any new impervious area be created, regardless of the area of impervious surface. Considers requirements to prepare a stormwater management strategy under Rule WH.R11 for any impervious surface on a HRITP is too onerous. Unclear if new HRITP activities would fall under this rule. Notes impervious surfaces can control contaminants becoming entrained in stormwater.	That rule WH.R4 be amended to provide for discharges from new or redeveloped impervious surfaces for a specified area, i.e. up to 3,000m2, or a new rule created as a controlled or restricted discretionary activity for new or redeveloped impervious surfaces on a HRITP. Clarity on new HRITP sites in this rule.
S226.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new	Oppose	Concerned with restrictions for impervious surfaces on individual sites being limited to 1,000m2 as a permitted activity. Considers existing Rules R48/R49 for stormwater management and the	Increase the amount of impervious surface area as a permitted activity, subject to discharge water quality standards as conditions. Or amend the condition to provide

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and redeveloped impervious surfaces - permitted activity.		3,000m2 permitted area, is a more appropriate trigger. Requests permitted activity area is 3,000m2 or is calculated as a percentage of impervious area relative to the size of the site. Considers this will allow for larger sites to undertake impervious surfacing on relative scale to smaller sites. Considers impervious surfaces can provide positive outcomes, eg. paving an area of contaminated land.	for a percentage of impervious area relative to the total site size, as a permitted activity.
S226.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Oppose	Considers the application of this rule as a controlled activity is too narrow and considers the rule should allow for impervious surfaces on any site as a controlled activity, if between 1,000 - 3,000m2, and subject to conditions (i.e. not from a high risk industrial trade premise).	removed 'urbanised property' from the rule to account for impervious area between 1,000m2 - 3,000m2 as a controlled activity on any site. Provide a definition for 'existing urbanised area'.
S226.014	8 Whaitua Te Whanganui-a-Tara	Rule WH.R9: Stormwater from a local authority or state highway network- restricted discretionary activity.	Oppose	Considers intent is unclear as heading refers to stormwater from 'local authority or state highway networks' but text does not limit activity to these discharges, and is inclusive of all stormwater discharges unable to meet WH.R2 or WH.R3. As WH.R9 requires a stormwater management strategy, this suggests it aligns with the discharges from a local authority or state highway network, rather than an individual stormwater discharge. Rule text appears to align to these discharges also. Considers requirement for stormwater management strategies to be prepared (under Schedule 31) is onerous for sites with smaller discharges that meet permitted discharge quality conditions. Not providing a stormwater management strategy is non-complying activity under Rule WH.R12 for all	Creation of a new rule to differentiate from Rule WH.R9 to manage discharges into water, which may enter the network, as a restricted discretionary activity subject to water quality conditions. The new RD rule should not require a stormwater management strategy, but appropriate information provided in the consent application, including monitoring, to show compliance with discharge quality limit conditions. Amendment of WH.R9 so that it only relates to large urban area or state highway discharges.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				other stormwater discharges. Considers that this provides a very restrictive framework for stormwater discharges to water, and may lead to more applications sought as non-complying activities which appears unproportionally restrictive relative to the risk. Concerns it may lead to applicants applying for non-complying activities which avoids requirement for stormwater management strategies and is counter-intuitive to outcomes intended to be sought. Elements of a stormwater impact assessment appear overly onerous for small site developments which subsequently require smaller resource consent applications and supporting information. Under Schedule 29 (2), a catchment evaluation is required, and under (3), stormwater discharge calculations, which is too onerous a task for smaller site developments.	
S226.015	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Oppose	Considers the requirement of a full stormwater impact assessment is too onerous for discharges from sites greater than 1,000m2, that is not an urbanised property and there should be allowance for a controlled or restricted discretionary activity for impervious surfaces between 1,000 - 3,000m2.	Create new rule to provide for discharges from new or impervious areas, other than urbanised areas, as a controlled or restricted discretionary activity, which does not require the preparation of a stormwater impact assessment.
S226.016	12 Schedules	Schedule 29: Stormwater Impact Assessments.	Amend	Supports the requirement for stormwater impact assessments for large scale developments, municipal discharges, state highways, and other high risk facilities. Opposes requirements of Schedule 29 for smaller site development.	Amend Schedule 29 to only relate to large urban developments, municipal discharges, or discharges from state highway, rather than for small site development or discharges from any impervious area on a HRITP.
S226.017	12 Schedules	Schedule 31: Stormwate	Amend	Supports stormwater quality standards but considers the requirements of a stormwater	Amend Schedule 31 to only relate to large urban developments, municipal discharges, or discharges from state highway.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		r Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.		management plan too onerous for smaller sites where discharge quality conditions can be met.	

S002 Horokiwi Quarries Ltd

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S2.001	General comments	General comments - definitions	Amend	Considers the lack of definition for greenfield development, creates a high level of uncertainty about the kinds of development prohibited under rules WH.R13 and P.R12. States the level of uncertainty is inappropriate for a definition that determines the scope of prohibited activity rules. Questions whether the definition and associated provisions are intended to manage urban development on land not previously developed, as understood from the Section 32 Evaluation, or manage all types of development including quarries. Requests if the definition and associated provisions are intended to manage urban development only, this be clearly stated. Requests a definition be included to clarify what is anticipated and to avoid unnecessarily capturing all other activities. Also, seeks the definition expressly excludes activities that are not greenfield development, including quarrying activities.	Insert new definition of "greenfield development" as follows: **Greenfield development** **Means any urban development undertaken within a site or sites that has not previously been used for urban land use.** **Greenfield development does not include:** **Quarrying activities,...**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				The submitter proposes the following definition for greenfield development "urban development on land that has not been previously developed for urban land uses" Views this definition as similar to the Auckland Unitary Plan definition for greenfield. To support the proposed definition, the submitter requests the term "urban development" also be defined. Suggests the definition of "urban development" from the Regional Policy Statement would be appropriate and support integration between the RPS and the NRP.	
S2.002	General comments	General comments - definitions	Amend	Not stated	Insert new definition of "quarrying activities" as follows: **Has the same meaning as in the National Planning Standards (as set out below): means the extraction, processing (including crushing, screening, washing, and blending), transport, storage, sale and recycling of aggregates (clay, silt, rock, sand), the deposition of overburden material, rehabilitation, landscaping and cleanfilling of the quarry, and the use of land and accessory buildings for offices, workshops and car parking areas associated with the operation of the quarry.**
S2.003	General comments	General comments - definitions	Amend	The submitter states whilst the Natural Resources Plan defines "biodiversity offset," which relates primarily to indigenous biodiversity, and "offset" which is a more general definition, there is no definition for "aquatic offset" in PC1. Concerned that without a specific definition for aquatic offset, there is a risk the definition for biodiversity offset may be inappropriately applied. Considers it would be inconsistent with the NPS-FM to omit a definition defined within it.	Insert new definition of "aquatic offset" as follows: **Aquatic offset** **Has the same meaning as in the National Policy Statement for Freshwater Management (as set out below):** **means a measurable conservation outcome resulting from actions that are intended to:** **(b) redress any more than minor residual adverse effects on a wetland or river after all appropriate avoidance, minimisation, and remediation, measures have been sequentially applied; and** **(c) achieve no net loss, and preferably a net gain, in the extent and values of the wetland or river, where:** **(i) no net loss means that the measurable positive**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Submitter understands that consequential amendments may be required to objectives, policies, and rules to reference this term.	**effects of actions match any loss of extent or values over space and time, taking into account the type and location of the wetland or river; and** **(ii) net gain means that the measurable positive effects of actions exceed the point of no net loss**
S2.004	General comments	General comments - definitions	Amend	The submitter states whilst the NRP defines "biodiversity compensation," which relates primarily to indigenous biodiversity, there is no definition for "aquatic compensation". Concerned that without a specific definition for aquatic compensation, there is a risk the definition for biodiversity compensation will be inappropriately applied. Considers it would be inconsistent with the NPS-FM to omit a definition defined within it. Submitter understands that consequential amendments may be required to objectives, policies, and rules to reference this term.	Insert new definition of "Biodiversity compensation" as follows: **Biodiversity compensation** **Biodiversity compensation means a measurable positive environmental outcome resulting from actions that are designed to compensate for residual adverse biodiversity effects. The principles to be applied when proposing and considering biodiversity compensation are provided in Schedule G3 (biodiversity compensation).**
S2.005	General comments	General comments – stormwater management	Amend	States the current rule framework categorises quarrying activities as a form of "high-risk industrial or trade premise, " quarrying activities are subject to the following: - Rule WH.R4 - Rule WH.R11 - Rule WH.R12 - Rule WH.R13 The submitter has significant concerns with the framework as quarrying activities are not recognized, will incur consenting implications, and provide few consenting pathways. The submitter questions if the framework is intended to apply as it does since the S32 contains no consideration of	Insert new Rule WH.R4A as follows:**Rule WH.R4A: Stormwater from quarrying activities - permitted activity** **The discharge of stormwater from a quarrying activity into water, or onto or into land where it may enter a surface water body or coastal water, including where it is associated with the use of land for the creation of new, or redevelopment of existing impervious surfaces, is a permitted activity, provided the following conditions are met:** **(a) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				quarrying activities. Concerned reasonable activities (replacement of a concrete pad, or roof) will require consent despite the scale of the activity or whether there was an associated discharge. Submitter notes that operational stormwater discharges on their site would likely not meet the permitted rule and therefore, require consent as a non-complying activity. Requests a rule consistent with the RPS, which recognises the benefits of the region's mineral resources and seeks to enable the ongoing use of the resources. Supports the insertion of the following quarrying rules - A permitted activity rule that applies to all stormwater discharges from a quarrying activity, and - A restricted discretionary activity that applies where the permitted rule is not met and is subject to the stormwater discharge continuing to meet relevant target attribute states. States this approach is similar to that taken in Rules WH.R8, WH.R9, and WH.R10 when providing for airports and roading.	**land, and (b) the discharge does not contain wastewater, and (c) if the discharge is to land where it may enter groundwater, (i) the discharge cannot cause or exacerbate the flooding of any other property, and (ii) the discharge is not located within 20m of a bore used for water abstraction for potable supply or stock water, and (d) if the discharge is into a surface water body or into coastal water the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, (e) the discharge shall also not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (f) the discharge shall also not give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life. Insert new Rule WH.R8A as follows: Rule WH.R8A: Stormwater from a quarrying activity - restricted discretionary activity The discharge of stormwater from a quarrying activity into water, or onto or into land where it may enter a surface water body or coastal water, including where it is associated with the use of land for the creation of new, or redevelopment of existing impervious surfaces, is a restricted discretionary activity where: (a) Rule WH.R4A cannot be met, and (b) the target attribute state for copper and zinc in Table 8.4 is met for a relevant part Freshwater Management Unit, and (c) the coastal water objective for copper and zinc in Table 8.1 is met in the relevant coastal water management unit. Matters for discretion 1. The management of the adverse effects of stormwater capture and discharge, including on aquatic ecosystem health and mahinga kai, contact recreation and Māori customary use 2. The management of effects on sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (indigenous biodiversity) 3. Minimisation of the adverse effects of stormwater discharges 4. Provision for hydrological control measures where

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					discharges will enter a surface water body (including from an existing local authority stormwater network).
S2.006	General comments	General comments - overall	Amend	Whilst the submitter's concerns pertain to the Whaitua Te Whanganui-a-Tara, to ensure consistency, the submitter supports consistent relief to the Whaitua Te Awarua-o-Porirua Objectives, Policies, and Rules.	Amend relevant provisions in the Whaitua Te Awarua-o-Porirua (Objectives, Policies and Rules), consistent with relief sought in submission points within this submission.
S2.007	General comments	General comments - unplanned greenfield development	Amend	Concerned with the proposed approach to regulate unplanned greenfield development as it is unclear what types of development activity are prohibited, and whether it would prohibit the development or upgrading of quarrying activities.	Define the term "greenfield development"
S2.008	General comments	General comments - stormwater management	Oppose	Considers financial contributions should not be a mandatory means of providing for aquatic offsetting, and resource consent applicants should have the opportunity to provide aquatic offsetting or compensation in accordance with Appendix 6 or 7 of the NPS-FM as part of their proposal.	Not stated
S2.009	2 Interpretation	Earthworks	Amend	Requests the definition for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua include the full list of exemptions provided in the existing definition of earthworks, noting amendments are sought to clarify that the exclusions are disjunctive through the use of 'or'. Supports the clarification provided to exemption clause (i) of the existing definition.	Amend the definition of "Earthworks" as follows: Earthworks For Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua only: The alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); ~~but excludes gardening, cultivation, and disturbance of land for the installation of fence posts.~~ **Earthworks do not include:** **(a) cultivation of the soil for the establishment of crops or pasture, or** **(b) the harvesting of crops, or** **(c) thrusting, boring, trenching or mole ploughing**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					associated with cable or pipe laying and maintenance, or **(d) the construction, repair, upgrade or maintenance of:** **(i) pipelines, or** **(ii) electricity lines and their support structures, including the National Grid, or** **(iii) telecommunication structures or lines, or** **(iv) radio communication structures, or** **(v) firebreaks or fence lines, or** **(vi) a bore or geotechnical investigation bore, or** **(e) repair or maintenance of existing roads and tracks, and airfield runways, taxiways, and parking aprons for aircraft, or** **(f) maintenance of orchards and shelterbelts, or** **(g) domestic gardening, or** **(h) repair, sealing or resealing of a road, footpath, driveway, or** **(i) discharge of cleanfill material to a cleanfill area** Except that, for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20, 'earthworks' has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017. For all other whaitua: The disturbance of a land surface from the time soil is first disturbed on a site until the time the site is stabilised. Earthworks includes blading, contouring, ripping, moving, removing, placing or replacing soil or earth, by excavation, or by cutting or filling operations, or by root raking. Earthworks do not include: (a) cultivation of the soil for the establishment of crops or pasture, ~~and~~ or (b) the harvesting of crops, ~~and~~ **or** (c) thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, ~~and~~

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					or (d) the construction, repair, upgrade or maintenance of: (vii) pipelines, ~~and~~ **or** (viii) electricity lines and their support structures, including the National Grid, ~~and~~ **or** (ix) telecommunication structures or lines, ~~and~~ **or** (x) radio communication structures, ~~and~~ **or** (xi) firebreaks or fence lines, ~~and~~ **or** (xii) a bore or geotechnical investigation bore, ~~and~~ **or** (e) repair or maintenance of existing roads and tracks, and airfield runways, taxiways, and parking aprons for aircraft, ~~and~~ **or** (f) maintenance of orchards and shelterbelts, ~~and~~ **or** (g) domestic gardening, ~~and~~ **or** (h) repair, sealing or resealing of a road, footpath, driveway, and or (i) discharge of cleanfill material to a cleanfill area
S2.010	2 Interpretation	High risk industrial or trade premise	Amend	Opposes the list of activities provided in the definition as the list includes activities, such as mineral extraction, refining, reprocessing, storage, and use, which are unlikely to generate industrial or trade waste contaminants. The Submitter requests the list be removed as there is insufficient evidence that the activities listed are high-risk industrial or trade premises, and it implies that those activities are pre-determined as meeting the definition (which is considered unhelpful). Opposes the use of the word 'contaminants' within the definition. The submitter considers the term "contaminant," as defined in the RMA, too broad to be used in the definition as "contaminant" could include any substance that is not the stormwater itself. Concerned all industrial or trade premises could potentially fall under the definition (not just those storing, generating, or using hazardous substances). Considers the scope of activities	Amend the definition of "high risk industrial or trade premise" as follows: High risk industrial or trade premise An industrial or trade premise that stores, uses or generates ~~contaminants or~~ hazardous substances on-site that are exposed to rain and could become entrained in stormwater. ~~Activities that may occur at these premises could include:~~ ~~- boat construction and maintenance~~ ~~- commercial cement, concrete or lime manufacturing or storage~~ ~~- chemical manufacture, formulation or bulk storage, recovery, processing or recycling~~ ~~- fertiliser manufacture or bulk storage~~ ~~- storage of hazardous wastes including waste dumps or dam tailings associated with mining activities~~ ~~- petroleum or petrochemical industries including a petroleum depot, terminal blending plant or refinery, or facilities for recovery, reprocessing or recycling petroleum-based materials,~~ ~~- scrap yards including automotive dismantling, wrecking or~~

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				covered by the definition is unclear. On the basis that the focus of the provisions the definition relates to is the management of the risk of hazardous substances from high-risk industrial or trade premises being entrained in stormwater, the submitter requests the definition be amended to delete reference to "contaminants" and focus only on hazardous substances. Suggests this would also provide greater clarity to plan users on the scope of activities that will fall under the definition.	~~scrap metal yards~~ ~~- wood treatment or preservation, or bulk storage of treated timber~~ ~~- mineral extraction, refining and reprocessing, storage, and use~~ ~~- explosives and ordinances production, storage, and use~~ ~~- electronics including the commercial manufacturing, reconditioning, or recycling of computers, televisions, and other electronic devices~~ ~~- waste recycling, treatment, and disposal~~ ~~- engineering workshops with metal fabrication, or electroplaters power stations, substations, or switchyards.~~
S2.011	2 Interpretation	Highest erosion risk land (pasture)	Oppose	Opposes the mapping associated with these definitions, and in particular the "high erosion risk land (woody vegetation)" which is referenced in rules. The submitter demonstrates how the mapping is applied to their site in the raw submission Concerned the mapping is too high level and has not been substantiated. States that it is unclear how this mapping has been based, or whether it has been trothed. For example, the mapping of "Highest erosion risk land (Woody vegetation)" includes many small areas of identified land that are incohesive (the size of each individual square identified in the maps is 5m by 5m). The submitter questions the value of regulating small, incohesive areas of woody vegetation, given that the controlled activity threshold for vegetation clearance is 200m2. To ensure that the maps (and the rules for vegetation removal) are efficient to administer and effective at achieving their intended outcome, the submitter considers that the maps should be amended to only identify cohesive areas of woody vegetation, and remove incohesive or isolated areas. For consistency with the rules, isolated areas	Update all the mapping (pasture, woody vegetation and plantation forestry) with accurate and evidence-based mapping, or delete definitions and retain existing definition of "erosion prone land" as shown below:**Erosion prone land** **The pre-existing slope of the land exceeds 20 degrees.** Should the definitions be retained, the submitter seeks that those definitions are subject to the Part 1 Schedule 1 Process and not the Freshwater Planning Process.

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				smaller than 200m2 should be removed from the maps. The submitter appreciates that this approach seeks to nuance the existing definition of 'erosion-prone land' in the operative plan which simply is defined by the slope of the land. However, the submitter considers that until GWRC has undertaken a robust vegetation and land instability mapping exercise, the former approach should be retained. Opposes notifying these definitions as part of the Freshwater Planning Process as the definition and associated rules relate to soil conservation and not freshwater. The submitter also notes that this would be inconsistent with the approach taken to the overarching objective and policy (derived from S2 of the RMA) of the Proposed Change 1 Regional Policy Statement, which have been confirmed by GWRC officers as subject to the Schedule 1 Process.	
S2.012	2 Interpretation	Impervious surfaces	Amend	Submitter notes that the definition would currently capture a range of surfaces that may exist within a quarry, including: - Concrete pads, - Haul roads, - Site offices, - Storage sheds, - Processing plant. Considers based on the Section 32 evaluation, the impervious surface rules are intended to capture urban development (e.g. residential, commercial and industrial activities in an urban area). Concerned the definition and associated rules as drafted would capture quarrying activities and	Amend the definition of "impervious surface" as follows: Impervious surfaces Surfaces that prevent or significantly impede the infiltration of stormwater into soil or the ground, includes: roofs paved areas (including sealed/compacted metal) such as roads, driveways, parking areas, sidewalks/foot paths or patios, and excludes: grassed areas, gardens and other vegetated areas porous or permeable paving slatted decks which allow water to drain through to a permeable surface porous or permeable paving and living roofs roof areas with rainwater collection and reuse

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				prevent a reasonable consenting pathway. Seeks the definition explicitly exclude impervious surfaces associated with quarrying activities.	any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)**any impervious surface associated with a quarrying activity**
S2.013	2 Interpretation	Unplanned greenfield development	Amend	Seeks consequential amendment to this definition to include the defined term of 'greenfield development'. Submission refers to submission points seeking new definitions for Greenfield Development and Urban Development.	Amend the definition of "unplanned greenfield development" as follows: Unplanned greenfield development **Greenfield development** within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 which also require an underlying zone change (from rural/non-urban/open space to urban) though a District Plan change to enable the development. Note: Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023.
S2.014	5.4 Beds of lakes and rivers	Rule R128: New structures - permitted activity.	Oppose	Considers the removal of the reference to "structure" from the chapeau of the rule significantly reduces the range of structures that are permitted under the rule. States this change removes the ability to construct minor structures within the bed of a river without the need for resource consent and will make the following permitted structures a discretionary activity under R145: - Intake structures, - Outfall structures, - Weirs (excluding those used for sediment retention) - Fish screens, - Fish passage devices, - Navigational aid structure, and - temporary structures. Considers the existing rule appropriately provides for minor structures (less than 10 m2) through permitted conditions limiting the size of a structure. Considers the requirement to seek resource consent for the above activities is onerous, will result in unnecessary consenting costs, and is not	Changes are rejected and Rule R128 is retained as operative

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				efficient or effective. Considers this matter would be addressed by reinstating the words "structure, including" to the chapeau of the rule. States the Section 32 evaluation provided little explanation for the proposed change, other than the rule providing for a broad range of structures is inappropriate. States there is no acknowledgment of the efficiency of requiring resource consent for all minor structures that are no longer permitted.	
S2.015	5.4 Beds of lakes and rivers	Rule R151A: Ongoing diversion of a river - permitted activity.	Support	Supports the inclusion of this rule which will negate the requirement for long term river diversions where that diversion is permanent.	Retain as notified.
S2.016	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai	Amend	Supports this long-term vision for Whaitua Te Whanganui-a-Tara, however, seeks the changes outlined below to ensure requirements are reasonably achievable. Considers Āhua (natural character) restoration should only occur where natural character has been degraded. Considers that without providing for this caveat, it sets an unrealistic requirement on what is being restored and the baseline state. Considers requirements to plant the margins of freshwater bodies will not always be practicable as there are freshwater bodies that cannot have planted margins for various reasons including being piped or being of a concrete channel. Seeks this clause be amended to be "as far as practicable".	Amend Objective WH.O1 as follows: Objective WH.O1 The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100. Note In the wai ora state: Āhua (natural character) is restored **where it has been degraded** and freshwater bodies exhibit their natural quality, rhythms, range of flows, form, hydrology and character~~All~~ freshwater bodies have planted margins **as far as practicable** All freshwater bodies and coastal waters have healthy functioning ecosystems and their water conditions and habitat support the presence, abundance, survival and recovery of At-risk and Threatened species and taonga species Mahinga kai and kaimoana species are healthy, plentiful enough for long term harvest and are safe to harvest and eat

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		ora by 2100.			or use, including for manuhiri and to exercise manaakitanga Mana whenua are able to undertake customary practices at a range of places throughout the catchment.
S2.017	8 Whaitua Te Whanganui-a-Tara	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	Amend	Considers the direction in clause (b) and (c) to protect groundwater-dependent ecosystems and ecosystems in connected surface water bodies is inconsistent with the NPS-FM, which requires freshwater and freshwater ecosystems to be "maintained" through Policy 5. The Submitter notes that "protection" is only afforded to outstanding freshwater bodies and habitats of indigenous freshwater species through Policies 8 and 9 of the NPS-FM accordingly. Considers protection to be a higher bar than maintain which could lead to perverse outcomes and an inability for reasonable development to occur. Seeks clarification on the term aquifer consolidation referenced in Clause (f).	1. Clarify what is "aquifer consolidation", and 2. Amend Objective WH.O6 as follows: Groundwater flows and levels, and water quality, are maintained at levels that: (a) ensure base flows or levels in surface water bodies and springs are supported and salt-water intrusion is avoided, and (b)~~protect~~ **maintain** groundwater dependent ecosystems, and (c) ~~protect~~ **maintain** ecosystems in connected surface water bodies, and (d)ensure that groundwater is of sufficient quality for human and stock drinking water, and (e) ensure there is not a long-term decline in mean annual groundwater levels, including artesian pressures and (f) avoid aquifer consolidation.
S2.018	8 Whaitua Te Whanganui-a-Tara	Policy WH.P1: Improvement of aquatic ecosystem health.	Amend	Clause (a) requires a progressive reduction in the load and concentration of contaminants. The submitter understands that this is aligned with the required reductions to achieve improvements in water quality as required by Objective WH.O9. As drafted, the clause implies that this would apply to all water bodies, regardless of whether improvement is required or not. Changes are sought by the submitter to clarify this. Considers clause (b) would be applied broadly to all habitats, including exotic. States there is no requirement under the NPS-FM to restore all habitats, rather it is limited to indigenous wetland habitat, and restoration should only be required where that habitat has been degraded. The submitter seeks changes to clarify that restoration is	Amend Policy WH.P1 as follows: Policy WH.P1: Improvement of aquatic ecosystem health Aquatic ecosystem health will be improved by: (a) progressively reducing the load or concentration of contaminants **where improvement in water quality is required,** particularly sediment, nutrients, pathogens and metals, entering water, and (b) restoring **indigenous** habitats **that have been degraded,** and (c) enhancing the natural flow regime of rivers and managing water flows and levels, including where there is interaction of flows between surface water and groundwater, and (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.~~

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				limited to indigenous habitats and to caveat only to where those habitats have been degraded. Considers clause (d) is unclear about what is being coordinated and prioritised. It is also unclear what "catchments that require changes to land use activities that impact water" means, who decides this, or what those activities are. Suggests this clause should rather refer to enabling work programmes that provide for improvement. The submitter also notes that clause (d) is a method rather than a policy directive. Suggests that consideration is given to whether this would be better suited as a method rather than a policy directive.	
S2.019	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	Seeks amendments to clause (a) of this policy as described below. Considers this policy to be inappropriate because the definition of "unplanned greenfield development" is broad and uncertain. On this basis, the submitter 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	Amend Policy WH.P2 as follows: Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives: Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (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 (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers (d) requiring a reduction in contaminant loads from

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				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. Supports the direction of Clause (e), but notes that the planting of riparian margins may not always be practicable. Changes are sought to recognise this.	urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation **where practicable,** and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.
S2.020	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	Amend	Opposes this policy as it would apply to stormwater discharges from a quarry site and the direction is not practicable. Considers the policy is specifically directed toward urban activities as while these requirements are appropriate for urban development, they cannot be practicably applied to non-urban activities, including quarrying activities.	Amend Policy WH.P10 as follows: Policy WH.P10: Managing adverse effects of stormwater discharges All stormwater discharges **from new urban development and** associated land use activities shall be managed by: (a) using source control to minimise contaminants in the stormwater discharge and maximise, to the extent practicable, the removal of contaminants from stormwater, including through the use of water sensitive urban design measures, and

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					(b) using hydrological control and water sensitive urban design measures to avoid, remedy or mitigate adverse effects of stormwater quantity and maintain, to the extent practicable, natural stream flows, and (c) installing, where practicable, a stormwater treatment system for stormwater discharges from a property or properties taking into account: (i) the treatment quality (load reduction factor), and (ii) opportunities for the retention or detention of stormwater flows or volume, including any flood storage volume required, and (iii) any potential adverse effects that may arise as a result of the stormwater treatment system or discharge, including erosion and scour, and localised adverse water quality effects, and (iv) inspections, monitoring and ongoing maintenance, including costs, to maintain functionality in terms of treatment quality and capacity, and (v) existing or proposed communal stormwater treatment systems in the stormwater catchment or sub-catchment, or part Freshwater Management Unit.
S2.021	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Amend	Considers it impracticable to avoid contaminants being entrained in stormwater as is acknowledged in the section 32 evaluation report, and by policies such as WH.P15, which recognises that there may be residual stormwater contaminants associated with development. Considers that as the focus of the policy is on the management of hazardous substances prepared, used, or stored at high-risk industrial and trade premises, reference to contaminants generally should be removed from the policy, so the policy is implementable and retains a clear focus on the management of hazardous substances. Considers the management of stormwater	Amend Policy WH.P11 as follows: Policy WH.P11: Discharges of ~~contaminants~~ **hazardous substances** in stormwater from high risk industrial or trade premises The discharge of stormwater to water, including discharges ~~via~~ **from** the stormwater network, from a high risk industrial or trade premise shall be managed by: a) having procedures and equipment in place to contain any spillage of hazardous substances for storage or removal, and b) avoiding ~~contaminants or~~ hazardous substances being entrained in stormwater and discharged to a surface water body or coastal water, including via the stormwater network, or where avoidance is not practicable, implementing good management practice to avoid or minimise adverse effects on the environment, including reducing contaminant volumes

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				contaminants is provided for under policies WH.P10 and WH.P14, which will also apply to high-risk industrial or trade premises. Seeks amendment to remove the general term "contaminants" from the policy.	and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and c) installing an interceptor where there is a risk of petroleum hydrocarbons entering into the stormwater network, a surface water body or coastal water, and d) avoiding or mitigating adverse effects of stormwater discharges on groundwater quality.
S2.022	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Seeks consequential amendments to the policy in line with the relief sought in relation to the submission point seeking a new definition of Greenfield Development. Changes sought include defining "greenfield development" and referencing urban development as being the activity the policy relates. Requests the terms rain gardens and bioretention devices as referenced in Clause (a)(ii) be defined.	Amend Policy WH.P14 as follows: Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces The adverse effects of stormwater discharges from new greenfield development shall be minimised, and adverse effects of stormwater discharges from existing urban areas **caused by urban development** reduced to the extent practicable, upon redevelopment, through implementing: (a) an on-site stormwater treatment system or an off-site communal stormwater treatment system that is designed to: (i) receive at least 85% of the mean annual runoff volume stormwater generated from new and redeveloped impervious surfaces of the property, and (ii) achieve copper and zinc load reductions factors equivalent to that of a raingarden/bioretention device, and (b) where stormwater discharges will enter a river, hydrological controls either on-site, or off-site via a communal And Amend the definitions section to include a definition of "raingarden" and "bioretention device".
S2.023	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant	Amend	Seeks this policy be amended so it's consistent with the effects management hierarchy set out in the NPS-FM, which requires that aquatic offsetting or compensation is provided in circumstances where residual adverse effects are more than minor.	Amend Policy WH.P15 as follows: Policy WH.P15: Stormwater contaminant offsetting **or compensation** for new **greenfield development** **Where** ~~T~~**there are more than minor residual** adverse effects ~~of residual~~ (posttreatment) **caused by** stormwater contaminants from new greenfield development, roads (not

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		offsetting for new greenfield developm ent.		Suggests financial contributions should not be a mandatory means of providing for aquatic offsetting, and resource consent applicants should have a reasonable opportunity to provide aquatic offsetting or compensation in accordance with Appendix 6 or 7 of the NPS-FM as part of their proposal. Considers the policy (and associated rules) implies that "an existing or new stormwater network" is a receiving environment, however, Stormwater networks are piped, and therefore, any water within a stormwater network is not considered 'water' or subject to the Regional Council's jurisdiction. States that while the rule may apply to stormwater discharges to a surface waterbody from a stormwater network, it cannot manage effects before this point. Requests that if reference is to be retained, it be clarified as being "from" the stormwater network to ensure the policy and associated rules are not ultra vires.	already captured as part of a greenfield development) and state highways where the discharge will enter a surface water body or coastal water, including ~~via~~ **from** an existing or new stormwater network, **those effects must be managed by way of an aquatic offset or aquatic compensation, including through the following:** **(a) are to be provide an aquatic** offset by way of a financial contribution in accordance with Schedule 30 (financial contribution), **or** **(b) provide an aquatic offset in accordance with the principles for aquatic** **offsetting in Appendix 6 of the NPS-FM, and** **(c) where more than minor residual adverse effects cannot be offset, aquatic** **compensation must be provided in accordance with the principles for** **aquatic compensation in Appendix 7 of the NPS-FM.**
S2.024	8 Whaitua Te Whangan ui-a-Tara	Policy WH.P16: Stormwate r discharges from new unplanned greenfield developm ent.	Oppose	Considers there is a lack of clarity (based on the definitions as notified) as to what activities the policy applies to, and its direction being based on an effect, rather than a land use. Considers there is insufficient evidence provided through the Section 32 evaluation to justify the strong policy directive and to suggest that all new stormwater discharges from unplanned greenfield develop will cause significant effects.	Delete policy.
S2.025	8 Whaitua Te Whangan ui-a-Tara	Policy WH.P29: Managem ent of earthwork s.	Amend	Supports in principle but seeks amendments to this policy to clarify its intent and practicability as described below. Considers the word "risk" should be replaced with "adverse effects" in the chapeau, as resource	Amend Policy WH.P29 as follows: Policy WH.P29: Management of earthworks The ~~risk~~ **adverse effects** of sediment discharges from earthworks shall be managed by: (a) ~~requiring retention of soil and sediment on the land~~

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				management policies should seek to manage actual or potential adverse effects of an activity, rather than risks generally. Considers the requirement to retain soil and sediment on site under clause (a) does not recognise that soil and sediment may need to be removed from site in a controlled manner (for example, to a clean fill area). Considers clause (b) should be qualified with "where practicable" to recognise that any limits placed on land disturbance should be reasonable and proportionate, particularly in the context of the good management practices already required by clause (a).	**undertaking earthworks in accordance with**~~using~~ good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in **general** accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region(2021), ~~for the duration of the land disturbance,~~ and (b) limiting **where practicable,** the amount of land disturbed at any time, and (c) designing and implementing earthworks with knowledge of the existing environmental site constraints, specific engineering requirements and implementation of controls to limit the discharge of sediment to receiving environments, and (d) requiring erosion and sediment control measures to be installed prior to, and during earthworks and ensuring those controls remain in place and are maintained until the land is stabilised against erosion.
S2.026	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Amend	Requests policy is changed to refer to discharges to natural receiving waterbodies rather than to "an existing or new stormwater network" and "artificial watercourse". Considers the requirement under clause (c) to have a "suitably qualified person" monitor the discharge is not practicable in all circumstances and will result in an unreasonable cost burden on consent holders. Seeks that the clause is amended to provide some discretion and to also provide for a "suitably trained person" rather than a qualified individual.	Amend Policy WH.P30 as follows: Policy WH.P30: Discharge standard for earthworks The discharge of sediment from earthworks over an area greater than 3,000m2 shall: (a) not exceed 100g/m3 at the point of discharge where the discharge is to a surface water body, or coastal water, ~~stormwater network or to an artificial watercourse,~~ except that when the discharge is to a river with background total suspended solids that exceed 100g/m3, the

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					discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) be managed using good management practices in accordance with the GWRC Erosion and Sediment Control Guidelines for the Wellington Region (2021), to achieve the discharge standard in (a), and (c)**where required,** be monitored by a suitably qualified **or trained** person, and the results reported to the Wellington Regional Council.
S2.027	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose	Opposes policy in its entirety. Considers the requirement for all earthworks over 3,000m2 to be shut down over the winter months is inappropriate, as it does not recognise circumstances where earthworks need to occur over those months, including quarrying activities, and is not supported by sufficient evidence Considers that in instances where earthworks are unavoidable during winter, careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Considers that as the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021) provides a pathway for earthworks to be undertaken during the winter months subject to careful management (refer specifically to section G5.0 of	Delete the policy.

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				the guideline), a pathway should remain available to applicants through the consent process. Considers Section 32 Evaluation justification to be very limited, other than the climatic characteristics of the winter months being more likely to cause increased sediment discharges. Questions this assumption as rainfall events that would cause uncontrolled releases of sediment can occur at any time of the year, and will only increase with the effects of climate change.	
S2.028	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Amend	Based on the relief sought to include specific rules for Quarrying activities and amendments sought to definitions, the submitter seeks amendment to Rule R4 clarifying its application.	Amend Rule WH.R4 as follows: Rule WH.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity The discharge of stormwater from an existing high risk industrial or trade premise, that is not a port, or airport or **from quarrying activities,** into water, or onto or into land where it may enter water, including ~~via~~ **from** an existing local authority stormwater network, is a permitted activity, provided the following conditions are met: (a) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (b) the discharge does not contain wastewater, and (c) if the discharge is to land where it may enter groundwater, (i) the discharge cannot cause or exacerbate the flooding of any other property, and (ii) the discharge is not located within 20m of a bore used for water abstraction for potable supply or stock water, and (d) any ~~contaminants~~ hazardous substances stored or used on site, ~~or~~

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					~~hazardous substances,~~ cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or (i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or (ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons, and (e) .....
S2.029	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Concerned discretionary consent requirements under Rule WH.R11, for the redevelopment of impervious surfaces at high-risk industrial or trade premises, could lead to perverse environmental outcomes, such as, impervious surfaces being left to degrade rather than obtain a consent. Considers degraded impervious surfaces will be less effective at containing contaminants (including the accidental spillage of hazardous substances) than redeveloped impervious surfaces. Based on the relief sought to include specific rules for quarrying activities and amendments sought to definitions, the submitter seeks amendment to rule R5 clarifying that it would not apply to quarrying activities. Should the rule continue to apply to quarrying activities, the submitter states amendments are needed.	Amend Rule WH.R5 as follows: Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, **including** ~~through~~ **from** an existing or new local authority stormwater network, that is not a high risk industrial or trade premise, **a quarrying activity** or unplanned greenfield development, is a permitted activity, provided the following conditions are met: (a) the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m2 (baseline property existing impervious area as at 30 October 2023) and

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					(b) all new building materials associated with the development shall not include exposed zinc (including galvanised steel) or copper roof, cladding and spouting materials, and (c) the proposal provides hydrological control measures (for example rain tanks) onsite or offsite, where discharges will enter a surface water body (including ~~via~~ **from** an existing local authority stormwater network): (i) for all impervious areas associated with a greenfield development, or (ii) for all redeveloped and new impervious areas involving greater than 30m2 of impervious area of a redevelopment (of an existing urbanised property), and (d) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (e) the discharge does not contain wastewater, and (f) the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and where the discharge is not ~~via~~ **from** an existing or new local authority stormwater network: (g) the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and

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					(h) the discharge shall not give rise to the following effects beyond the**zone of reasonable mixing:** (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% ....
S2.030	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Considers the proposed rules make new or redeveloped impervious surfaces at high-risk industrial or trade premises (including quarrying activities) a discretionary activity under rule WH.R11. Based on the relief sought to include specific rules for quarrying activities and amendments sought to definitions, the submitter seeks an amendment to the chapeau of rule R6, clarifying that it would not apply to quarrying activities. An amendment is also sought to clause (d) to clarify that this is "from" rather than "through" a stormwater network. Should the rule continue to apply to quarrying activities, the submitter states amendments are needed.	Amend Rule WH.R6 as follows: Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity The use of land for the creation of new impervious surfaces for greenfield development and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, **including** ~~through~~ **from** an existing local authority stormwater network, that is not a high risk industrial or trade premise, **a quarrying activity** or unplanned greenfield development, is a controlled activity, provided the following conditions are met: (a) the proposal involves the creation of new impervious surfaces of between 1,000m2 and 3,000m2 (baseline property existing impervious area as at 30 October 2023) or, (b) the proposal involves the creation new impervious surfaces of less than 1,000m2, but is not permitted under the conditions of Rule WH.R5, and, (c) a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of

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					contribution and when it is required is set out in Schedule 30 (financial contributions), and (d) where stormwater directly or indirectly (~~through~~ **from** an existing local authority stormwater network) discharges to a river, hydrological control is provided either: (i) on-site, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has been sized to accommodate the proposed stormwater discharges, and (e) stormwater contaminant treatment is provided that captures 85% of the mean annual runoff and directs it to a stormwater treatment system that treats in accordance with Schedule 28 (contaminant treatment) and is provided either: (i) on-site, or off-site through an existing local authority stormwater network or privately owned stormwater treatment system that has capacity to treat contaminant loads from the site. Matters of control .....
S2.031	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Amend	Considers it inappropriate to require financial contributions as a condition due to the following reasons: - It's not consistent with the NPS-FM to require mandatory financial contributions for aquatic offsetting, as the effects management hierarchy in the NPS-FM only requires offsetting in circumstances where residual adverse effects are more than minor. - Where residual adverse effects are more than minor, applicants should have the opportunity to	Amend Rule WH.R11 as follows: Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including ~~through~~ **from** an existing local authority

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				propose aquatic offsetting or compensation in accordance with Appendix 6 or 7 of the NPS-FM. Considers where aquatic offsetting or compensation (which may include financial contributions under Schedule 30) is necessary, It can be provided for as a condition of consent with reference to the requirements of policy WH.P15. Seeks the deletion of clause (b) in line with changes sought to Policy WH.P15.	stormwater network, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or Rule WH.R7, or prohibited under WH.R13 is a discretionary activity provided the following conditions ~~are~~ is met: (a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), ~~and~~ ~~(b) if the proposal is for greenfield development a financial contribution~~ ~~is paid for the purpose of offsetting the adverse effects of residual~~ ~~stormwater contaminants. The level of contribution and when it is~~ ~~required is set out in Schedule 30 (financial contributions).~~
S2.032	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Amend	Considers the move from a discretionary activity in the operative NRP to non-complying activity status for all other stormwater discharges is not clearly explained or justified in the section 32 evaluation report and does not appropriately provide for activities that do not meet permitted activity conditions, but can otherwise be managed through consent conditions. Concerned a minor non-compliance with conditions under rules WH.R2, WH.R3, and WH.R4, for stormwater discharges will trigger this non-complying activity rule. Subject to acceptance of the submission point seeking a new rule (WH.R8A), the submitter would be neutral to this rule.	Amend Rule WH.R12 as follows: Rule WH.R12: All other stormwater discharges - non-complying activity The: (a) discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule WH.R2, or (b) discharge of stormwater into water or onto or into land where it may enter a surface water body or coastal water, that is not permitted by Rule WH.R3, or a restricted discretionary activity under Rules WH.R8 or WH.R9, or (c) discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule WH.R4, or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade premise that does not meet the conditions of Rule WH.R11, or (d) use of land for the creation of new or

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					redevelopment of existing impervious surfaces and the associated discharge of stormwater into water or onto or into land where it may enter water, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or WH.R7, or a discretionary activity under Rule WH.R10 or WH.R11, or a prohibited activity under WH.R13, **or (e) discharge of stormwater from a quarrying activity that is not permitted by Rule WH.R4A, does not meet restricted discretionary by Rule WH.R8A,.**
S2.033	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Considers the general approach taken by PC1 to "unplanned greenfield development" is inappropriate because the definition of "unplanned greenfield development" is broad and uncertain. In particular, it is unclear whether all development is prohibited by the approach, or just specific kinds of urban development. Concerned the approach could prohibit or constrain works associated with the Horokiwi quarry if considered to be "unplanned greenfield development". Considers policies and rules prohibiting "unplanned greenfield development", at the quarry to be contrary to the RPS (Objective 31 and Policy 60) which recognises the benefits of mineral resources. Opposes this rule as notified stating the creation of impervious surfaces within an active quarry is inevitable through the need for concrete pads etc. Considers a private plan change to the NRP to enable the continued operation of the quarry would be costly for an activity that should be anticipated. Considers the intention of the rule (based on the S32 Evaluation) is to account for new greenfield urban development not previously planned rather than applying to all activities. Providing the intention	Either delete Rule WH.R13 in its entirety or Amend Rule WH.R13 as follows: Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity The use of land **for new urban development** and the associated discharge of stormwater from impervious surfaces from **the urban development within** unplanned greenfield development **that directly enters** ~~direct into~~ **water,** or **enters** onto or into land where it may enter a surface water body or coastal water, including ~~through~~ **from an** existing or proposed stormwater network, is a prohibited activity. Note Any urban development within an area of unplanned greenfield development proposals will require a plan change to the relevant map (Map 86, 87, 88 or 89) to allow consideration of the suitability of the site and receiving catchment(s) for accommodating the water quality requirements of the National Policy Statement for Freshwater Management 2020, and the relevant freshwater and coastal water quality objectives of this Plan. Any plan change process should be considered concurrent with any associated

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				of this rule was to account for all development, it is considered that the evidence provided through the Section 32 Evaluation justifying the rule and the evaluation against the efficiencies and effectiveness are insufficient. If the intent of the rule is to target urban development, the submitter seeks changes to clarify this. If the intent of the rule is to account for all development, the submitter seeks the rule to be deleted in its entirety. A default non-complying activity for quarrying activities is sought under WH.R12.	
S2.034	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity.	Oppose	Should the definition and mapping be retained, the submitter considers that the rule is limiting in that it does not allow for any vegetation clearance of the specified land for most land uses. Considers the existing approach of managing erosion-prone land under Rule R104 -R107 of the NRP is more fit for purpose. Also, based on the Section 32 Evaluation, there are no apparent implementation issues associated with the existing rule framework. While the submitter's preference is that the existing rules of the operative plan are retained, should the proposed rules remain, they seek that the permitted rule provides for additional clearance of up to 200 m2 to avoid clearance of less than 200m2 becoming an innominate activity (and therefore discretionary). Opposes that the rule is subject to the Freshwater Planning Process as the rule relates to erosion and	Review mapping and definition of "erosion prone land". Consider Rule WH.R17 under a Part 1 Schedule 1 process. Amend Rule WH.R17 as follows: Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a surface water body is a permitted activity provided the following conditions are met: (a) the vegetation clearance is: (i) to implement an action in the erosion risk treatment plan for the farm, or**(ii)** for the control of pest plants, **or** **(iii) no more than 200 m2 per property of vegetation clearance on highest** **erosion risk land (woody vegetation) in any consecutive 12-month**

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				soil conservation, rather than specifically freshwater. Considers this to be inconsistent with the approach taken to the overarching objective and policy of the RPS Change 1 which considered those under the Schedule 1 process.	**period,** and (b) debris from the vegetation clearance is not placed where it can enter a surface water body.
S2.035	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land - controlled activity.	Neutral	Supports Rule WH.R18 in principle but considers this rule could be anticipated to capture the majority of vegetation clearance applications sought, where the permitted rule is not met. Clarification is sought as to how the 200m2 is calculated - is it the actual and cumulative area of identified woody vegetation or on a site that contains an area of woody vegetation? Opposes subjecting the rule to the Freshwater Planning Process as the rule relates to erosion and soil conservation, rather than specifically freshwater. Considers this to be inconsistent with the approach taken to the overarching objective and policy of the RPS Change 1 which considered those under the Schedule 1 process.	Review mapping and definition of "erosion prone land". Consider Rule WH.R18 under a Part 1 Schedule 1 process. Retain a controlled activity rule for vegetation clearance greater than 200 m2 over high erosion risk land. Clarify how the 200m2 will be calculated.
S2.036	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance - discretionary activity.	Amend	Depending on the outcome of other submission points, the submitter is neutral on rule WH.R19. Opposes subjecting the rule to the Freshwater Planning Process as the rule relates to erosion and soil conservation, rather than specifically freshwater. Considers this to be inconsistent with the approach taken to the overarching objective and policy of the RPS Change 1 which considered those under the Schedule 1 process.	Review mapping and definition of "erosion prone land". Consider Rule WH.R18 under a Part 1 Schedule 1 process.
S2.037	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks -	Amend	Considers the use of "and" at the end of condition (b) excludes all earthworks that are not related to implementing farm erosion risk treatment plans or farm environmental plans from the permitted activity rule. As a result, all other earthworks, regardless of	Consider Rule WH.R23 under a Part 1 Schedule 1 process. Amend Rule WH.R23 as follows: Rule WH.R23: Earthworks - permitted activity Earthworks **and the associated discharge of sediment**

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		permitted activity.		size or whether they meet conditions (c) to (h) will be a restricted discretionary activity under rule WH.R24. Considers it is not efficient or effective to require resource consent for all earthworks, regardless of scale. Nor does it appear to be consistent with policies WH.P30 and WH.P31, which emphasise controlling earthworks over 3,000m2. The submitter notes that the inclusion of associated discharges to water is necessary to ensure the rule relates to a regional function. Without doing so, this rule would simply be regulating land use which is a territorial authority function. Considers clause (g) should not be included in Rule WH.R23 as discharges associated with earthworks are managed under rule (R91). Considers clause (g) is inappropriate as it's not consistent with the minor discharges rule, which permits a minor discharge of suspended solids to surface water bodies or coastal water. Opposes the rule being included within the freshwater planning instrument as the purpose of the rule is to manage land use for soil conservation. Given that the rule does not provide for discharges associated with earthworks, there is no justification for including it in the freshwater planning instrument. The submitter seeks that it be reallocated to the Part 1 Schedule 1 planning instrument.	**and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface waterbody or coastal water, including from a stormwater network,** is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, ~~and~~ **or** (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and~~(g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and~~ (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note

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					Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).
S2.038	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	Opposes the direction to avoid earthworks over the winter months. Considers prohibiting earthworks over the winter months is not supported by evidence and is not reasonable, particularly for activities that are required year-round such as quarrying. Considers the intent of the policy direction (to minimise the risk of an uncontrolled discharge) can continue to be appropriately managed through matters of discretion - specifically matter 1. Therefore it is requested clause (b) and matter of discretion 8 be deleted.	Amend Rule WH.R24 as follows: Rule WH.R24: Earthworks - restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~ Matters for discretion 1. The location, area, scale, volume, duration and staging and timing of works 2. The design and suitability of erosion of sediment control measures

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					including consideration of hazard mitigation and the risk of accelerated soil erosion associated the staging of works and progressive stabilisation 3. The placement and treatment of stockpiled materials on the site, including requirements to remove material if it is not to be reused on the site 4. The proportion of unstabilised land in the catchment 5. The adequacy and efficiency of stabilisation devices for sediment control 6. Any adverse effects on: (i) groundwater, surface water bodies and their margins, particularly surface water bodies within sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori customary use) or Schedule I (important trout fishery rivers and spawning waters) (ii) group drinking water supplies and community drinking water supplies (iii) mauri, water quality (including water quality in the coastal marine area), aquatic and marine ecosystem health, aquatic and riparian habitat quality, indigenous biodiversity values, mahinga kai and critical life cycle periods for indigenous aquatic species (iv) the natural character of lakes, rivers, natural wetlands and their margins and the coastal environment (v) natural hazards, land stability, soil erosion, sedimentation and flood hazard management including the use of natural buffers 7. Duration of the consent~~8. Preparation required for the~~

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					~~close-down period (from 1st June to 30th September each year) and any maintenance activities required during this period~~ 9. Monitoring and reporting requirements
S2.039	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Oppose	Considers that the non-complying activity rule is not sufficiently justified in the section 32 evaluation and does not appropriately provide for activities that do not meet restricted discretionary activity conditions, but which can otherwise be managed through consent conditions as a discretionary activity.	Amend Rule WH.R25 as follows: Rule WH.R25: Earthworks - ~~non-complying~~ **discretionary** activity Earthworks, and the associated discharge of sediment into a surface water body or coastal water or onto or into land where it may enter a surface water body or coastal water from earthworks, including via a stormwater network, that does not comply with Rule WH.R24 is a ~~non-complying~~ **discretionary** activity.
S2.040	12 Schedules	Schedule 29: Stormwater Impact Assessments.	Neutral	Considers this schedule, and the associated rule, is directed at new urban development. Should the relief sought in earlier submission points not be granted and the schedule apply to quarrying activities, the submitter opposes the schedule and seeks amendment to ensure the schedule is appropriate and fit for purpose in the context of quarrying activities. Should the schedule not apply to quarrying activities, the submitter is neutral on the schedule.	No decision sought subject to acceptance of submission point for new quarry specific rules.
S2.041	12 Schedules	Schedule 30: Financial Contributions.	Neutral	As noted in the submission point on WH.P15 it is considered that requiring a financial contribution as an offset may only be applied where it is optional along with other forms of aquatic offsetting. Subject to the changes sought on P15 and R11, the submitter is neutral to this Schedule.	No decision sought subject to acceptance of submission points on P15 and R11.
S2.042	12 Schedules	Schedule 33: Vegetation Clearance Erosion	Amend	Opposes the schedule being included within the freshwater planning instrument, as the purpose of the schedule is to manage land use for soil conservation. Considers this to be inconsistent with the approach taken to the overarching objective and	Consider Schedule 33 under a Part 1 Schedule 1 process. Amend Part B of Schedule 33 as follows: A Management objectives The Erosion and Sediment Management Plan must

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		and Sediment Management Plan.		policy of the RPS Change 1 which considered those under the Schedule 1 process. The schedule is generally supported subject to an amendment to clause (d) to recognise that restoring and revegetating is not always practicable, particularly for activities such as quarrying where surfaces must remain exposed.	demonstrate that the measures adopted to address the identified risks will: (a) minimise sediment loss from the vegetation clearance by adopting, as a minimum, good management practice, and (b) avoid an increase in risk of loss of sediment to water relative to the risk of loss that exists from the land in a natural state, and (c) minimise the discharge of water and sediment resulting from the vegetation clearance into a surface water body, and (d) **where appropriate,** provide for the land to be restored and revegetated with appropriate species.

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S12.001	General comments	General comments - rural	Not Stated	Proposed rules restricting rural land use change would make crop rotation impossible, which is an essential horticultural management practice for soil health and reducing disease pressure. Notes that planting vegetables or cover crops with differing nutrient needs in succession can reduce fertiliser requirements. Considers that it can be appropriate to change land use from low-intensity horticulture (orcharding) to other horticulture use (vegetable growing). Suggests a permitted activity status for a change from horticulture to horticulture and for crop rotation is more appropriate. Considers that a change in pastoral land use to horticulture will contribute to the reduction of greenhouse gas emissions and should be enabled to achieve regional emissions targets. Considers National Direction does not restrict the conversion of land to horticulture due to freshwater concerns but rather recognises vegetable growing as nationally	Not stated

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				significant through Specified Vegetable Growing Areas (National Policy Statement for Freshwater Management , Clause 3.33). The National Environmental Standards for Freshwater does control the intensification of dairy farming, but not other activities. Considers proposed land use change rules to be inefficient and ineffective. Considers a targeted approach that considers catchment contaminants and targeted mitigations for the highest contributing activities is more appropriate. Considers that most vegetables are grown only for domestic consumption, and it is not expected that vegetable growing will expand at a faster rate than population growth. Considers that restricting vegetable production will have nutritional and affordability consequences.	
S12.002	8 Whaitua Te Whanganui-a-Tara	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Amend	Does not support the method of capping nitrogen discharges from individual properties. Suggests a targeted approach at the freshwater management unit (FMU) or sub-catchment scale. Recommends identifying contaminants degrading water quality and establishing and distributing contaminant load restrictions to different activities based on community values, prioritising the second hierarchy of Te Mana o te Wai (health needs of people, including drinking water and fresh fruits and vegetables), and reducing regional greenhouse gas emissions. Also suggests the framework should have a method to measure compliance with load reduction requirements. Considers capping discharges on every property is not a targeted approach and may adversely affect activities of great importance to the local community. Considers that nitrogen risk assessment tools that work for pastoral farming may not be appropriate for horticulture. Questions meaning of "intensively farmed" as fruit and vegetable growing are not	Amend Policy WH.P22 wording to as follows: ~~Capping~~, minimising and reducing diffuse discharges of nitrogen from farming activities Diffuse nitrogen discharges from large rural properties and from smaller rural properties that are intensively farmed, are ~~capped,~~ minimised and, on large properties ~~and horticultural properties,~~ reduced where necessary by ensuring that:

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				intensive farming practices. Suggests the council provide scientific evidence to justifying what is considered to be "intensive farming". Recognition of good management practices is supported.	
S12.003	8 Whaitua Te Whanganui-a-Tara	Policy WH.P25: Managing rural land use change.	Oppose	Suggests that land use changes should be enabled to allow for economic diversification and transition to low emissions land uses. Expressed that mixed farming systems support improved freshwater outcomes, and that fruit and vegetable growers can manage freshwater effects through freshwater farm plans and best management practices. Considers this policy would prevent crop rotation, a management practice for soil health and reducing disease pressure. Suggest a new policy enabling crop rotation is required. Considers that 4ha is too small a parcel to trigger controlled land use change. Freshwater farm plan rules start at 5ha for horticulture	Delete Policy WH.P25. Introduce a new Policy WH.PX for Crop Rotation. Wording for this policy is as follows: Manage commercial vegetable production, including the flexibility to undertake crop rotations on multiple and/or changing properties with a Farm Environment Plan.
S12.004	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Support	Supports a permitted activity status for horticulture with a requirement for a farm environment plan for activities over 5 ha.	Retain as notified.
S12.005	8 Whaitua Te Whanganui-a-Tara	Rule WH.R31: Change of rural land use - discretionary activity.	Oppose	Concerned that this rule will prevent crop rotation, a management practice for soil health and reducing disease pressure. Considers that it can be appropriate to change land use from low-intensity horticulture (orcharding) to other horticulture use (vegetable growing). Suggests a permitted activity status for a change from horticulture to horticulture and for crop rotation is more appropriate. Considers that a change in pastoral land use to horticulture will	Delete WH.R31.

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				contribute to the reduction of greenhouse gas emissions and should be enabled to achieve regional emissions targets. Considers that restrictions on vegetable production will have consequences on food security.	
S12.006	9 Te Awarua-o-Porirua Whaitua	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Amend	Does not support the method of capping nitrogen discharges from individual properties. Suggests a targeted approach at the freshwater management unit (FMU) or sub-catchment scale. Recommends identifying contaminants degrading water quality and establishing and distributing contaminant load restrictions to different activities based on community values, prioritising the second hierarchy of Te Mana o te Wai (health needs of people, including drinking water and fresh fruits and vegetables), and reducing regional greenhouse gas emissions. Also suggests the framework should have a method to measure compliance with load reduction requirements. Considers capping discharges on every property is not a targeted approach and may adversely affect activities of great importance to the local community. Considers that nitrogen risk assessment tools that work for pastoral farming may not be appropriate for horticulture. Questions meaning of "intensively farmed" as fruit and vegetable growing are not intensive farming practices. Suggests the council provide scientific evidence to justifying what is considered to be "intensive farming". Recognition of good management practices is supported.	Amend Policy P.P21 wording to as follows: ~~Capping~~, minimising and reducing diffuse discharges of nitrogen from farming activities Diffuse nitrogen discharges from large rural properties and from smaller rural properties that are intensively farmed, are ~~capped~~, minimised and, on large properties ~~and horticultural properties,~~ reduced where necessary by ensuring that:
S12.007	9 Te Awarua-o-Porirua Whaitua	Policy P.P24: Managing rural land use change.	Oppose	Suggests that land use changes should be enabled to allow for economic diversification and transition to low emissions land uses. Expressed that mixed farming supports improved freshwater outcomes and effects on freshwater can be managed through the implementation of best management	Delete Policy P.P24. Introduce a new Policy WH.PX for Crop Rotation. Wording for this policy is as follows: Manage commercial vegetable production, including the flexibility to undertake crop rotations on ,multiple and/or changing properties with a Farm Environment Plan.

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				practices and freshwater management plans. Considers this policy will prevent crop rotation and a new policy enabling crop rotation and pastoral to horticulture land use changes is required. Considers that 4ha is too small a parcel to trigger controlled land use change. Freshwater farm plan rules start at 5ha for horticulture .	
S12.008	9 Te Awarua-o-Porirua Whaitua	Rule P.R26: Farming activities on 20 hectares or more of land - permitted activity.	Support	Supports a permitted activity status for horticulture with a requirement for a farm environment plan for activities over 5 ha.	Retain as notified.
S12.009	9 Te Awarua-o-Porirua Whaitua	Rule P.R28: Change of rural land use - discretionary activity.	Oppose	Concerned that this rule will prevent crop rotation, a management practice for soil health and reducing disease pressure. Considers it can be appropriate to change land use from low-intensity horticulture (orcharding) to other horticulture use (vegetable growing). Suggests a permitted activity status for a change from horticulture to horticulture and for crop rotation is more appropriate. Considers a change in pastoral land use to horticulture will contribute to the reduction of greenhouse gas emissions and should be enabled to achieve regional emissions targets. Considers restrictions on vegetable production will have consequences on food security.	Delete P.R28.
S12.010	9 Te Awarua-o-Porirua Whaitua	Rule P.R31: Take and use of water - restricted	Amend	Supports the efficient use of water as a matter of discretion. Considers that equity and environmental sustainability should be included as matters of discretion for allocation as is required under Clause 156 of the Natural and Built Environment Act.	Retain Matter for discretion 1. The reasonable and efficient use of water, including the criteria in Schedule P (efficient use). Amend to include matters of discretion for environmental sustainability and equity.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discretionary activity.			

S211 Hutt City Council

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S211.001	General comments	General comments - overall	Amend	Supports the intent of PC1, however expressed concern with the inclusion of the 2040 E. coli target, and the prohibition of unplanned urban growth.	Not stated
S211.002	General comments	General comments - target attribute states	Amend	Considers that setting an E. coli target timeframe of 2060 will be less costly to HCC ratepayers than the proposed 2040 timeframe.	Not stated
S211.003	General comments	General comments - target attribute states	Amend	Considers repair and upgrading the public network would only reduce a proportion of the contaminant load and there will be substantial costs to landowners to upgrade pipes (private laterals) within the private wastewater network that make a significant portion of untreated discharges to land and water, to meet the proposed 2040 target. Notes Wellington Water's concern in relation to the ability to deliver the work required to meet the 2040 target.	Amend the proposed 2040 E.coli target timeframe to 2060.
S211.004	General comments	General comments - urban development	Amend	Considers the prohibited activity status for unplanned urban growth is most restrictive activity and prevents the possibility of applying for resource consent. Notes Lower Hutt has sufficient housing capacity within existing urban areas for the next 30 years but there is a regional shortfall for industrial land. Notes the NPS-UD requires Council to review the Housing and Business Assessment (HBA) every three years to ensure that it provides sufficient housing and business development capacity based on the results of the HBA.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S211.005	General comments	General comments - urban development	Not Stated	Considers that the proposed prohibited activity status for unplanned greenfield development is inconsistent with Policy 8 of the NPS-UD, could prevent HCC from meeting its ongoing requirements under the NPS-UD, and precludes consenting pathways for development in unplanned greenfield areas which would otherwise be appropriate and/or have positive outcomes.	Not stated
S211.006	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.	Support	Supports the 100 year vision towards full restoration of te-Whanganui-a-Tara's waterways. Seeks clarification on whether the text from "Note In the wai ora state..." is part of the objective or is an advisory note. Considers it is not physically possible for all water bodies to have planted margins, therefore seeks that the requirement for planted margins be qualified with "where possible".	Objective WH.O1 The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.~~Note~~ In the wai ora state: -Āhua (natural character) is restored and freshwater bodies exhibit their natural quality, rhythms, range of flows, form, hydrology and character -All freshwater bodies have planted margins**where possible** -All freshwater bodies and coastal waters have healthy functioning ecosystems and their water conditions and habitat support the presence, abundance, survival and recovery of At-risk and Threatened species and taonga species -Mahinga kai and kaimoana species are healthy, plentiful enough for long term harvest and are safe to harvest and eat or use, including for manuhiri and to exercise manaakitanga -Mana whenua are able to undertake customary practices at a range of places throughout the catchment.
S211.007	8 Whaitua Te Whanganui-a-Tara	Table 8.1 Coastal water objectives.	Oppose	Considers increased cost to ratepayers to meet the 2040 E. coli target timeframe on top of business as usual rates increase is unaffordable. Considers a 2060 target more achievable than the 2040 target, providing other funding avenues are explored such as growth charging and debt funding and significant central government funding. Considers that repairing the public network would only reduce a portion of the contaminant load, noting that there will be substantial costs to landowners to upgrade	Amend the timeframe for target states for E.coli and enterococci coastal water objectives to 2060.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				pipes within the private wastewater network to meet the proposed 2040 target, particularly in relation to achieving Criteria WH.O3 (g) and (h). Concerned with lack of information on the achievability of target attribute states, including the impact on Council assets and city wide development capacity to allow informed decision making, citing similar concerns raised by other parties as set out in the s32 report. Considers that the funding requirements on housing and business development capacity is not sufficiently explored in the s32 evaluation	
S211.008	8 Whaitua Te Whanganui-a-Tara	Objective WH.O8: Primary contact sites within Te Awa Kairangi/Hutt River, Pākuratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact.	Support	Considers there are significant challenges in terms of the costs to upgrade the wastewater network to achieve the reduction in E.coli by 2040. Supports the inclusion of 2040 in Objective WH.08 on the basis that it does not impose the same significant challenges and costs on Council.	Amend Objective WH.O8 as follows: Primary contact sites within Te Awa Kairangi/Hutt River, Pākuratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact by ensuring that by ~~2040~~ **2060**~~:~~ (a) Escherichia coli concentrations are at least maintained, or improved where the target attribute states in Table 8.3 are not met, and (b) there is low risk of health effects from exposure to benthic cyanobacteria.
S211.009	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Oppose	Considers increased cost to ratepayers to meet the 2040 E. coli target timeframe on top of business as usual rates increase is unaffordable. Considers a 2060 target more achievable than the 2040 target, providing other funding avenues are explored such as growth charging and debt funding and significant central government funding. Considers that repairing the public network would only reduce a	Amend the timeframe for target states for E.coli and enterococci coastal water objectives to 2060.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				portion of the contaminant load, noting that there will be substantial costs to landowners to upgrade pipes within the private wastewater network to meet the proposed 2040 target, particularly in relation to achieving Criteria WH.O3 (g) and (h). Concerned with lack of information on the achievability of target attribute states, including the impact on Council assets and city wide development capacity to allow informed decision making, citing similar concerns raised by other parties as set out in the s32 report. Considers that the funding requirements on housing and business development capacity is not sufficiently explored in the s32 evaluation	
S211.010	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	Concerned with the proposed prohibited activity status for unplanned greenfield development; considers that this precludes consenting pathways for development in unplanned greenfield areas which may have positive outcomes. Concerned that minor activities which extend into unplanned greenfield areas would be prohibited. Considers the s32 evaluation insufficient to justify the proposed prohibited activity status, noting contradictions with regard to the ability of PC1 to mitigate contaminants from urban developments. Further considers that the prohibition on greenfield development is inconsistent with the NPS-UD, particularly Policy 8, and may conflict with the submitter'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. Considers that there will be a high economic cost to undertake two simultaneous plan changes, which is not sufficiently assessed in the s32 report.	Amend Policy WH.P2 as follows: Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (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~~(b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and~~ (c) imposing hydrological controls on urban development and stormwater discharges to rivers (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Seeks that this policy direction is amended to "avoid", with a non-complying activity status. Considers that Policy WH.P2(b) is not consistent with and duplicates (c) and (d), noting that the use of "encouraging" in (b) is inconsistent with "imposing" in (c) and "requiring" in (d).	woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater
S211.011	8 Whaitua Te Whanganui-a-Tara	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Amend	Supports the use of actions plans to achieve objectives, provided that they are developed in partnership with territorial authorities.	Amend Policy WH.P3 as follows: Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways The Wellington Regional Council shall, in partnership with mana whenua **and territorial authorities,** prepare and deliver Freshwater Action Plans in accordance with Schedule 27 (Freshwater Action Plan). The first iteration of Freshwater Action Plans, to cover all rivers and lakes in the Whaitua Te Whanganui-a-Tara, shall be completed by December 2026. Freshwater Action Plans shall identify, in detail, the actions, including to support effective regulation, to achieve the target attribute states, and support relevant environmental outcomes, set in this Plan.
S211.012	8 Whaitua Te Whanganui-a-Tara	Policy WH.P7: Discharges to groundwater.	Amend	Supports in principle the reduction in point source discharges to ground water, however seeks clarification on policy wording, such as how discharges will be managed and how groundwater quality will be measured.	Review wording of policy to clarify intent.
S211.013	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	Amend	Supports in principle the regulation of stormwater contaminants through hydrological control and WSUD to improve freshwater outcomes. Notes there is overlap with Hutt City District Plan rules which also manage hydrology of stormwater to manage the demand on the three waters network from urban development, which is not addressed in the s32 report. Considers PC1 provisions are light on detail on how hydrological controls and WSUD will be implemented, in comparison with the THW-Three Waters chapter of the Draft Hutt City District Plan	~~Develop more comprehensive objectives and policies for hydrological control and WSUD measures including acceptable solutions and amend policy .~~ Develop a more comprehensive policy and implementation framework with regard to hydrological control and water sensitive urban design measures, including acceptable solutions and amend policy accordingly.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				which requires hydraulic neutrality measures to assist with managing peak stormwater runoff from development sites so the risk of downstream flooding is not increased, and assist with prolonging the life of existing stormwater management systems. Considers the inclusion of technical specifications in the NRP can assist smaller developments as they could rely on the technical specifications without having to develop bespoke solutions for their site and undertaking expensive hydrological and/or engineering calculations to demonstrate compliance. Supports the recognition of catchment-scale communal schemes.	
S211.014	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Support	Support managing these discharges.	Retain as notified
S211.015	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Oppose	Considers that there is insufficient evidence to support Policy WH.P16. Considers that the policy duplicates WH.P2(a) and is therefore unnecessary.	Delete Policy WH.P16:~~Policy WH.P16: Stormwater discharges from new unplanned greenfield development. Avoid all new stormwater discharges from unplanned greenfield development where the discharge will enter a surface water body or coastal water, including through an existing local authority stormwater network.~~
S211.016	8 Whaitua Te	Policy WH.P17: General	Amend	Supports the maintenance and improvement of wastewater discharges, subject to relief sought in	Retain as notified provided target attribute states for E.coli amended to 2060 in Table 8.1 and Table 8.4.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	wastewater policy to achieve target attribute states and coastal objectives.		regard to target attribute states for E.coli in Table 8.1 and 8.4.	
S211.017	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Amend	Disagrees with the s32 evaluation, which states that there is higher risk of sediment discharge during the winter period (June-September). Considers that large storm events can occur throughout the year, resulting in large sediment discharges. Considers that earthworks during the winter period may be appropriate when there is a poor summer earthworks period due to adverse weather. Considers a BAU approach for winter earthworks should be maintained as a standard condition of consent as a discretionary activity which would allow GW to provide permits to undertake earthworks within this period as appropriate and subject to conditions.	Delete policy ~~Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).~~
S211.018	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Amend	Supports the intent of the rule. However, considers that as written, the rule requires regional consent for all new connections to the stormwater network. Seeks clarification on why such activities should be regulated by GWRC, as opposed to the relevant territorial authority. Considers that the rule largely duplicates Rule WH.R3.	Consolidate WH.R2 and WH.R3 into one rule; or amend as follows: Rule WH.R2: Stormwater to land - permitted activity The discharge of stormwater onto or into land, including where contaminants may enter groundwater: (a) that is not from a high risk industrial or trade premise, or (b) **that is not connected to** ~~that does not discharge from, or to,~~ a local authority stormwater network, is a permitted activity provided the following conditions are met: (...)
S211.019	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual	Amend	Supports the intent of the rule. However, considers that as written, the rule requires regional consent for all new connections to the stormwater network. Seeks clarification on why such activities should be regulated by GWRC, as opposed to the relevant	Consolidate WH.R2 and WH.R3 into one rule; or amend as follows: Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity The discharge of stormwater from an existing individual

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		property to surface water or coastal water - permitted activity.		territorial authority. Considers that the rule largely duplicates Rule WH.R2.	property into water, or onto or into land where it may enter a surface water body or coastal water, (a) that is not from a high risk industrial or trade premise, or (b) that is not from a port, airport or state highway, or (c) **that is not connected to** ~~does not discharge from, or to,~~ a local authority stormwater network, is a permitted activity, provided the following conditions are met: (...)
S211.020	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Supports GWRC taking a greater role in regulating changes in impervious surfaces and requiring interventions, however considers the rule will have a significant economic impact on urban development. Considers the rule does not outline what types of hydrological controls should be implemented and does not provide clarity on solutions that would be considered acceptable for compliance, nor does the definition for "hydrological control". States that the second matter of control refers to best practicable options, however does not outline what these are. States that the s32 report does not quantify the costs of acceptable controls and the economic impact on urban development.	Develop an acceptable solution for compliance by: - incorporating guidance by reference; or - within the rule itself; or - as an appendix to the plan.
S211.021	8 Whaitua Te Whanganui-a-Tara	Rule WH.R10: Stormwater from new state highways- discretionary activity.	Amend	Seeks clarification on what is considered to be a new state highway.	Review rule wording.
S211.022	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development -	Amend	Concerned with the proposed prohibited activity status for unplanned greenfield development; considers that this precludes consenting pathways for development in unplanned greenfield areas which may have positive outcomes. Concerned that minor activities which extend into unplanned greenfield areas would be prohibited.	Amend rule WH.R13 as follows: Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity The use of land and the associated discharge of stormwater from impervious surfaces from unplanned greenfield development direct into water, or onto or into land where it may enter a surface water body or coastal water, including

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		prohibited activity.		Considers the s32 evaluation insufficient to justify the proposed prohibited activity status, noting contradictions with regard to the ability of PC1 to mitigate contaminants from urban developments. Further considers that the prohibition of greenfield development is inconsistent with the NPS-UD, particularly Policy 8, and may conflict with the submitter'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. Considers that there will be a high economic cost to undertake two simultaneous plan changes, which is not sufficiently assessed in the s32 report.	through an existing or proposed stormwater network, is a **non-complying** ~~prohibited~~ activity
S211.023	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	Seeks that road maintenance be excluded from earthworks in the rule, noting that activities such as road resealing would otherwise unnecessarily require resource consent. Considers that the use of "and" means that earthworks of any scale would require resource consent under Rule WH.R24 unless associated with an erosion risk treatment plan or farm environment plan.	Amend Rule WH.23 as follows: Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, ~~and~~ **or** (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					(h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.**Note: this rule excludes repair or maintenance of existing roads, or repair, sealing or resealing of a road, footpath or driveway.**
S211.024	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	Disagrees with the s32 evaluation, which states that there is higher risk of sediment discharge during the winter period (June-September). Considers large storm events can occur throughout the year, resulting in large sediment discharges. Considers that earthworks during the winter period may be appropriate when there is a poor summer earthworks period due to adverse weather. Considers a BAU approach for winter earthworks should be maintained as a standard condition of consent as a discretionary activity which would allow GW to provide permits to undertake earthworks within this period as appropriate and subject to conditions.	Amend Rule WH.R24 as follows: Rule WH.R24: Earthworks - restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and~~(b) earthworks shall not occur between 1st June and 30th September in any year~~
S211.025	13 Maps	Map 89: Unplanned greenfield areas - Hutt City Council.	Amend	Notes Map 89 reflects the Operative District Plan, however Council is yet to notify a district plan that fully implements the NPS-UD including the identified demand for housing and business land, therefore considers the avoid/prohibited approach may conflict with the submitter's ability to give effect to the NPS-UD.	Amend Map 89 to reflect the capacity required to meet identified housing and business demand in Hutt City

S032 Ian Douglas Stewart

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S32.001	8 Whaitua Te Whanganui-a-Tara	Objective WH.O2: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora.	Oppose	Considers Objective WH.02 is not the most appropriate way to achieve the purpose of the Act as it neither; "enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety", nor meets priority (c) of Objective 2.1(i) of the NPS-FM. Considers the lack of incorporation of the purpose and national direction (beyond environmental protection) leads to regulatory overreach and conflict with the provisions of the National Policy Statement for Highly Productive Land 2022.	Include the following wording after Objective WH.O2 outcomes (a-h) **"In achieving this trajectory, the following priorities will be recognised:** **a)Providing for the health needs of people (such as drinking water),** **b) Maintaining the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.**
S32.002	8 Whaitua Te Whanganui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from	Oppose	Comments relating to land use intensity are as follows: Considers the rules only apply for practical purposes to Upper Hutt District as there is almost no farmland in the catchment within Hutt City. Concerned that rural land subdivided to a size of 4ha to 4.2 ha will be caught by the 4-ha threshold where as remaining larger properties greater than 20 ha are within the threshold (RMA217D) where	Not Stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		farming activities.		farm plans are mandated under the Resource Management (Freshwater Farm Plans) Regulations 2023 and Resource Management (National Environmental Standards for Freshwater) Regulations 2020. Considers the provisions step beyond the mandate given by National Direction and represent a burden on landowners of properties between 4 and 20 ha . Outlines the Section 32 analysis as acknowledging there is no evidence that these blocks, are adversely impacting on water quality. Identifies changing rural land use practices (transition from grazing on hilly areas and dairy farming on the flats to rural lifestyle farming) have resulted in lower stocking density, less fertiliser application (on a sub catchment basis), riparian planting and progressive reforestation of the hillier areas. Views the rules as unnecessary as the land use changes the provisions of the plan encourage are already occurring. Considers nitrogen, E coli and sediment from farming practices are not the problem as water quality has not improved despite land use changes occurring.	
S32.003	8 Whaitua Te Whanganui-a-Tara	Policy WH.P22: Capping, minimising and reducing diffuse discharges	Oppose	Comments relating to stocking rates are as follows: Considers Regional Councils should be promoting the use of highly productive land for primary production as outlined in Section 6(11) of the Natural and Built Environment Act 2023 and the NPSHPL (Objective and Policies 1, 2 and 4) with freshwater management.	Not Stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		of nitrogen from farming activities.		Outlines land in smaller rural properties in the Awa Kairangi catchment has been identified as having a Land Use Capability of 3, which supports stocking rates of above 12 Stock Units/Ha with minimal fertiliser. States District Plan Rules already require Discretionary Activity Resource consent for intensive animal farming (Operative UHDP rule RPROZ-MC-2, Plan Change 50 rule RPROZ18). Concerned the requirements for registration and monitoring are too onerous for non-commercial farms and will result in the underuse of farming capacity to avoid expenses. Considers the imposition of these rules to be contrary to the NPSHPL and not meeting the Council's obligation under RMA s66(1)(ea) as there is a lack of evidence showing current stocking rates of small farms are directly causing adverse effects on water quality.	
S32.004	8 Whaitua Te Whanganui-a-Tara	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Oppose	Comments relating to land use intensity are as follows: Considers the rules only apply for practical purposes to Upper Hutt District as there is almost no farmland in the catchment within Hutt City. Concerned rural land subdivided to a size of 4ha to 4.2 ha will be caught by the 4-ha threshold where as remaining larger properties greater than 20 ha are within the threshold (RMA217D) where farm plans are mandated under the Resource Management (Freshwater Farm Plans) Regulations 2023 and Resource Management (National Environmental Standards for Freshwater) Regulations 2020.	Not Stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers the provisions step beyond the mandate given by National Direction and represent a burden on landowners of properties between 4 and 20 ha . Outlines the Section 32 analysis as acknowledging there is no evidence that these blocks, are adversely impacting on water quality. Identifies changing rural land use practices (transition from grazing on hilly areas and dairy farming on the flats to rural lifestyle farming) have resulted in lower stocking density, less fertiliser application (on a sub catchment basis), riparian planting and progressive reforestation of the hillier areas. Views the rules as unnecessary as the land use changes the provisions of the plan encourage are already occurring. Considers nitrogen, E coli and sediment from farming practices are not the problem as water quality has not improved despite land use changes occurring.	
S32.005	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high	Oppose	Comments relating to steeper land are as follows: Considers economic changes, government policy, district council subdivision rules and greater environmental awareness have resulted in the revegetation of previously grazed high and highest erosion risk land in the Awa Kairangi catchment. Outlines that an assessment of the LUCAS New Zealand map shows that less than 1% of the erosion prone land used for productive purposes is used for grazing whilst the remainder is used for plantation forestry.	Not Stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		risk of erosion.		Considers almost all of the highest erosion risk and over 80% of the high erosion risk land is located on blocks of greater than 20 ha which are required to prepare farm plans under the Resource Management (Freshwater Farm Plans) Regulations 2023. Outlines that smaller blocks identified as "74-Grassland with woody biomass" in the LUCAS land use map are protected by District Council vegetation clearance rules. Considers it appropriate that these district plan rules prevail. Submits that the sedimentation risks from grazing of erosion risk land, in this catchment are, de minimis in comparison to plantation forestry, almost entirely from grazing on blocks of greater than 20ha and adequately managed by the Resource Management (Freshwater Farm Plans) Regulations 2023.Considers vegetation clearance rules are contradictory to the District Planning rules and that vegetation rules are more appropriately addressed in district plans.	
S32.006	8 Whaitua Te Whanganui-a-Tara	Policy WH.P24: Phasing of farm environment plans.	Oppose	Comments relating to land use farm plans are as follows: Concerned PC1 requirements such as documentation, mapping, evidentiary, certification and auditing will burden rural landowners. Considers that documentary requirements will involve direct and Council recovery costs. Documentary requirements identified include: Erosion Risk Treatment Plans Erosion Sediment and Management Plans Farm Environment Plans Farm Registrations	Requests the Council review the list of planning, documentation, and certification requirements using the requirements in National Direction as a baseline. Considers that additional requirements should be justified through scientific evidence that proves they will achieve the environmental improvements sought in the plan and an analysis demonstrating that they are the best practical way of achieving those outcomes. Requests council removes the documentary requirements unless they are directly mandated by National Directions and do not directly duplicate National Environmental Standards requirements.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Freshwater Farm Plans Small Farm Registrations Small Stream Riparian Programmes. Considers that whilst part of the requirement is imposed by national direction, the names, requirements and application do not align with National Direction. Considers there to be no analysis of the costs of implementing the regime and states that the Section 32 analysis makes it clear that the effectiveness of the regime in achieving environmental outcomes has not been established. Considers there to be no reasonable basis for council to impose the farm planning regime on the rural community.	Requests council reviews the specific additional requirements to ensure that they are necessary, can be demonstrated to be effective, and are the most efficient way to achieve the stated purpose. States once this review is complete, the council can introduce new requirements, by variation or plan change.
S32.007	8 Whaitua Te Whanganui-a-Tara	Policy WH.P25: Managing rural land use change.	Oppose	Comments relating to stocking rates are as follows: Considers Regional Councils should be promoting the use of highly productive land for primary production as outlined in Section 6(11) of the Natural and Built Environment Act 2023 and the NPSHPL (Objective and Policies 1, 2 and 4) with freshwater management. Outlines that land in smaller rural properties in the Awa Kairangi catchment has been identified as having a Land Use Capability of 3, which supports stocking rates of above 12 Stock Units/Ha with minimal fertiliser. States that District Plan Rules already require Discretionary Activity Resource consent for intensive animal farming (Operative UHDP rule RPROZ-MC-2, Plan Change 50 rule RPROZ18). Concerned the requirements for registration and	Delete Policy WH.P25 or Change the area threshold for Policy WH.P25 from 4 ha to 10 ha.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				monitoring are too onerous for non-commercial farms and will result in the underuse of farming capacity to avoid expenses. Considers the imposition of these rules to be contrary to the NPSHPL and not meeting the Council's obligation under RMA s66(1)(ea) as there is a lack of evidence showing current stocking rates of small farms are directly causing adverse effects on water quality.	
S32.008	8 Whaitua Te Whanganui-a-Tara	Policy WH.P25: Managing rural land use change.	Oppose	Comments relating to land use intensity are as follows: Considers the rules only apply for practical purposes to Upper Hutt District as there is almost no farmland in the catchment within Hutt City. Concerned that rural land subdivided to a size of 4ha to 4.2 ha will be caught by the 4-ha threshold where as remaining larger properties greater than 20 ha are within the threshold (RMA217D) where farm plans are mandated under the Resource Management (Freshwater Farm Plans) Regulations 2023 and Resource Management (National Environmental Standards for Freshwater) Regulations 2020. Considers the provisions step beyond the mandate given by National Direction and represent a burden on landowners of properties between 4 and 20 ha . Outlines the Section 32 analysis as acknowledging there is no evidence that these blocks, are adversely impacting on water quality. Identifies changing rural land use practices (transition from grazing on hilly areas and dairy farming on the flats to rural lifestyle farming) have	Delete Policy WH.P25 or change the area threshold for Policy WH.P25 from 4 ha to 10 ha.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				resulted in lower stocking density, less fertiliser application (on a sub catchment basis), riparian planting and progressive reforestation of the hillier areas. Views the rules as unnecessary as the land use changes the provisions of the plan encourage are already occurring. Considers nitrogen, E coli and sediment from farming practices are not the problem as water quality has not improved despite land use changes occurring.	
S32.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity.	Oppose	Comments relating to steeper land are as follows: Considers economic changes, government policy, district council subdivision rules and greater environmental awareness have resulted in the revegetation of previously grazed high and highest erosion risk land in the Awa Kairangi catchment. Outlines that an assessment of the LUCAS New Zealand map shows that less than 1% of the erosion prone land used for productive purposes is used for grazing whilst the remainder is used for plantation forestry. Considers almost all of the highest erosion risk and over 80% of the high erosion risk land is located on blocks of greater than 20 ha which are required to prepare farm plans under the Resource Management (Freshwater Farm Plans) Regulations 2023. Outlines that smaller blocks identified as "74-Grassland with woody biomass" in the LUCAS land use map are protected by District Council vegetation clearance rules. Considers it appropriate	Delete Rule WH.R17 as it is covered by District Plan Rules.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				that these district plan rules prevail. Submits that the sedimentation risks from grazing of erosion risk land, in this catchment are, de minimis in comparison to plantation forestry, almost entirely from grazing on blocks of greater than 20ha and adequately managed by the Resource Management (Freshwater Farm Plans) Regulations 2023.Considers vegetation clearance rules are contradictory to the District Planning rules and that vegetation rules are more appropriately addressed in district plans.	
S32.010	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land - controlled activity.	Oppose	Comments relating to steeper land are as follows: Considers economic changes, government policy, district council subdivision rules and greater environmental awareness have resulted in the revegetation of previously grazed high and highest erosion risk land in the Awa Kairangi catchment. Outlines that an assessment of the LUCAS New Zealand map shows that less than 1% of the erosion prone land used for productive purposes is used for grazing whilst the remainder is used for plantation forestry. Considers almost all of the highest erosion risk and over 80% of the high erosion risk land is located on blocks of greater than 20 ha which are required to prepare farm plans under the Resource Management (Freshwater Farm Plans) Regulations 2023. Outlines that smaller blocks identified as "74-Grassland with woody biomass" in the LUCAS land use map are protected by District Council vegetation clearance rules. Considers it appropriate that these district plan rules prevail.	Delete Rule WH.R18 as it is covered by District Plan Rules.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Submits that the sedimentation risks from grazing of erosion risk land, in this catchment are, de minimis in comparison to plantation forestry, almost entirely from grazing on blocks of greater than 20ha and adequately managed by the Resource Management (Freshwater Farm Plans) Regulations 2023.Considers vegetation clearance rules are contradictory to the District Planning rules and that vegetation rules are more appropriately addressed in district plans. Considers economic changes, government policy, district council subdivision rules and greater environmental awareness have resulted in the revegetation of previously grazed high and highest erosion risk land in the Awa Kairangi catchment. Outlines that an assessment of the LUCAS New Zealand map shows that less than 1% of the erosion prone land used for productive purposes is used for grazing whilst the remainder is used for plantation forestry. Considers almost all of the highest erosion risk and over 80% of the high erosion risk land is located on blocks of greater than 20 ha which are required to prepare farm plans under the Resource Management (Freshwater Farm Plans) Regulations 2023. Outlines that smaller blocks identified as "74-Grassland with woody biomass" in the LUCAS land use map are protected by District Council vegetation clearance rules. Considers it appropriate that these district plan rules prevail. submits that the sedimentation risks from grazing of erosion risk land, in this catchment are: 1. De minimis in comparison to plantation forestry.	

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				2. Almost entirely from grazing on blocks of greater than 20ha. 3. Adequately managed by the Resource Management (Freshwater Farm Plans) Regulations 2023. Considers vegetation clearance rules are contradictory to the District Planning rules and that vegetation rules are more appropriately addressed in district plans.	
S32.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance - discretionary activity.	Oppose	Comments relating to steeper land are as follows: Considers economic changes, government policy, district council subdivision rules and greater environmental awareness have resulted in the revegetation of previously grazed high and highest erosion risk land in the Awa Kairangi catchment. Outlines that an assessment of the LUCAS New Zealand map shows that less than 1% of the erosion prone land used for productive purposes is used for grazing whilst the remainder is used for plantation forestry. Considers almost all of the highest erosion risk and over 80% of the high erosion risk land is located on blocks of greater than 20 ha which are required to prepare farm plans under the Resource Management (Freshwater Farm Plans) Regulations 2023. Outlines that smaller blocks identified as "74-Grassland with woody biomass" in the LUCAS land use map are protected by District Council vegetation clearance rules. Considers it appropriate that these district plan rules prevail. Submits that the sedimentation risks from grazing of	Delete Rule WH.R19 as it is covered by District Plan Rules.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				erosion risk land, in this catchment are, de minimis in comparison to plantation forestry, almost entirely from grazing on blocks of greater than 20ha and adequately managed by the Resource Management (Freshwater Farm Plans) Regulations 2023.Considers vegetation clearance rules are contradictory to the District Planning rules and that vegetation rules are more appropriately addressed in district plans. Considers economic changes, government policy, district council subdivision rules and greater environmental awareness have resulted in the revegetation of previously grazed high and highest erosion risk land in the Awa Kairangi catchment. Outlines that an assessment of the LUCAS New Zealand map shows that less than 1% of the erosion prone land used for productive purposes is used for grazing whilst the remainder is used for plantation forestry. Considers almost all of the highest erosion risk and over 80% of the high erosion risk land is located on blocks of greater than 20 ha which are required to prepare farm plans under the Resource Management (Freshwater Farm Plans) Regulations 2023. Outlines that smaller blocks identified as "74-Grassland with woody biomass" in the LUCAS land use map are protected by District Council vegetation clearance rules. Considers it appropriate that these district plan rules prevail. submits that the sedimentation risks from grazing of erosion risk land, in this catchment are: 1. De minimis in comparison to plantation forestry. 2. Almost entirely from grazing on blocks of greater than 20ha.	

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				3. Adequately managed by the Resource Management (Freshwater Farm Plans) Regulations 2023. Considers vegetation clearance rules are contradictory to the District Planning rules and that vegetation rules are more appropriately addressed in district plans.	
S32.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Comments relating to steeper land are as follows: Considers economic changes, government policy, district council subdivision rules and greater environmental awareness have resulted in the revegetation of previously grazed high and highest erosion risk land in the Awa Kairangi catchment. Outlines that an assessment of the LUCAS New Zealand map shows that less than 1% of the erosion prone land used for productive purposes is used for grazing whilst the remainder is used for plantation forestry. Considers almost all of the highest erosion risk and over 80% of the high erosion risk land is located on blocks of greater than 20 ha which are required to prepare farm plans under the Resource Management (Freshwater Farm Plans) Regulations 2023. Outlines that smaller blocks identified as "74-Grassland with woody biomass" in the LUCAS land use map are protected by District Council vegetation clearance rules. Considers it appropriate that these district plan rules prevail. Submits that the sedimentation risks from grazing of erosion risk land, in this catchment are, de minimis in comparison to plantation forestry, almost entirely	Either delete Rule WH.R26 or amend Rule WH.R26(b) to read: pastoral land use on **an area greater than 4 total effective hectares** of highest erosion risk land (pasture) and/or high erosion risk land (pasture),

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				from grazing on blocks of greater than 20ha and adequately managed by the Resource Management (Freshwater Farm Plans) Regulations 2023.Considers vegetation clearance rules are contradictory to the District Planning rules and that vegetation rules are more appropriately addressed in district plans. Considers economic changes, government policy, district council subdivision rules and greater environmental awareness have resulted in the revegetation of previously grazed high and highest erosion risk land in the Awa Kairangi catchment. Outlines that an assessment of the LUCAS New Zealand map shows that less than 1% of the erosion prone land used for productive purposes is used for grazing whilst the remainder is used for plantation forestry. Considers almost all of the highest erosion risk and over 80% of the high erosion risk land is located on blocks of greater than 20 ha which are required to prepare farm plans under the Resource Management (Freshwater Farm Plans) Regulations 2023. Outlines that smaller blocks identified as "74-Grassland with woody biomass" in the LUCAS land use map are protected by District Council vegetation clearance rules. Considers it appropriate that these district plan rules prevail. submits that the sedimentation risks from grazing of erosion risk land, in this catchment are: 1. De minimis in comparison to plantation forestry. 2. Almost entirely from grazing on blocks of greater than 20ha. 3. Adequately managed by the Resource Management (Freshwater Farm Plans) Regulations	

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				2023. Considers vegetation clearance rules are contradictory to the District Planning rules and that vegetation rules are more appropriately addressed in district plans.	
S32.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Comments relating to stocking rates are as follows: Considers Regional Councils should be promoting the use of highly productive land for primary production as outlined in Section 6(11) of the Natural and Built Environment Act 2023 and the NPSHPL (Objective and Policies 1, 2 and 4) with freshwater management. Outlines that land in smaller rural properties in the Awa Kairangi catchment has been identified as having a Land Use Capability of 3, which supports stocking rates of above 12 Stock Units/Ha with minimal fertiliser. States that District Plan Rules already require Discretionary Activity Resource consent for intensive animal farming (Operative UHDP rule RPROZ-MC-2, Plan Change 50 rule RPROZ18). Concerned the requirements for registration and monitoring are too onerous for non-commercial farms and will result in the underuse of farming capacity to avoid expenses. Considers the imposition of these rules to be contrary to the NPSHPL and not meeting the Council's obligation under RMA s66(1)(ea) as there is a lack of evidence showing current stocking rates of small farms are directly causing adverse effects on water quality.	Either, delete Rule WH.R26, change the area threshold for Rule WH.R26 from 4 ha to 10 ha or delete clause (a) from Rule WH.R26 where it applies to Highly Productive Land.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S32.014	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Oppose	Comments relating to land use intensity are as follows: Considers the rules only apply for practical purposes to Upper Hutt District as there is almost no farmland in the catchment within Hutt City. Concerned that rural land subdivided to a size of 4ha to 4.2 ha will be caught by the 4-ha threshold where as remaining larger properties greater than 20 ha are within the threshold (RMA217D) where farm plans are mandated under the Resource Management (Freshwater Farm Plans) Regulations 2023 and Resource Management (National Environmental Standards for Freshwater) Regulations 2020. Considers the provisions step beyond the mandate given by National Direction and represent a burden on landowners of properties between 4 and 20 ha . Outlines the Section 32 analysis as acknowledging there is no evidence that these blocks, are adversely impacting on water quality. Identifies changing rural land use practices (transition from grazing on hilly areas and dairy farming on the flats to rural lifestyle farming) have resulted in lower stocking density, less fertiliser application (on a sub catchment basis), riparian planting and progressive reforestation of the hillier areas. Views the rules as unnecessary as the land use changes the provisions of the plan encourage are already occurring. Considers nitrogen, E coli and sediment from farming practices are not the problem as water	Either, delete Rule WH.R26 or change the area threshold for Rule WH.R26 from 4 ha to 10 ha.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				quality has not improved despite land use changes occurring.	
S32.015	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	Comments relating to land use intensity are as follows: Considers the rules only apply for practical purposes to Upper Hutt District as there is almost no farmland in the catchment within Hutt City. Concerned that rural land subdivided to a size of 4ha to 4.2 ha will be caught by the 4-ha threshold where as remaining larger properties greater than 20 ha are within the threshold (RMA217D) where farm plans are mandated under the Resource Management (Freshwater Farm Plans) Regulations 2023 and Resource Management (National Environmental Standards for Freshwater) Regulations 2020. Considers the provisions step beyond the mandate given by National Direction and represent a burden on landowners of properties between 4 and 20 ha . Outlines the Section 32 analysis as acknowledging there is no evidence that these blocks, are adversely impacting on water quality. Identifies changing rural land use practices (transition from grazing on hilly areas and dairy farming on the flats to rural lifestyle farming) have resulted in lower stocking density, less fertiliser application (on a sub catchment basis), riparian planting and progressive reforestation of the hillier areas. Views the rules as unnecessary as the land use changes the provisions of the plan encourage are already occurring.	Not Stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers nitrogen, E coli and sediment from farming practices are not the problem as water quality has not improved despite land use changes occurring.	
S32.016	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Oppose	Comments relating to small rivers are as follows: Concerned these provisions will apply to almost all rural properties in the Mangaroa Catchment as overland flow can be interpreted as meeting the definition of river under the RMA. Considers it unreasonable and impractical to impose the proposed provisions on all stocking rates and slopes, particularly non-intensively farmed beef cattle on slopes greater than 10 degrees. Considers it unpractical and unnecessary to exclude stock from intermittently flowing areas, and that doing so to imposes a burden on landowners.	Recommends following the provisions of the SRE and exempt non intensive beef cattle from the small stream provisions Either Provide a definition of "small river" that makes it clear that the provisions only apply to permanently flowing water bodies or map the waterbodies that the provisions apply to so as to exclude ephemeral streams and overland flows.
S32.017	8 Whaitua Te Whanganui-a-Tara	Rule WH.R29: Livestock access to a small river - discretionary activity.	Oppose	Comments relating to small rivers are as follows: Concerned these provisions will apply to almost all rural properties in the Mangaroa Catchment as overland flow can be interpreted as meeting the definition of river under the RMA. Considers it unreasonable and impractical to impose the proposed provisions on all stocking rates and slopes, particularly non-intensively farmed beef cattle on slopes greater than 10 degrees. Considers it unpractical and unnecessary to exclude stock from intermittently flowing areas, and that doing so to imposes a burden on landowners.	Follow the provisions of the Stock Exclusion Regulations and exempt non intensive beef cattle from the small stream provisions, and either provide a definition of "small river" that makes it clear that the provisions only apply to permanently flowing water bodies or map the waterbodies that the provisions apply to so as to exclude ephemeral streams and overland flows.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S32.018	12 Schedules	Schedule 35: Small farm registration.	Oppose	Comments relating to stocking rates are as follows: Considers Regional Councils should be promoting the use of highly productive land for primary production as outlined in Section 6(11) of the Natural and Built Environment Act 2023 and the NPSHPL (Objective and Policies 1, 2 and 4) with freshwater management. Outlines that land in smaller rural properties in the Awa Kairangi catchment has been identified as having a Land Use Capability of 3, which supports stocking rates of above 12 Stock Units/Ha with minimal fertiliser. States that District Plan Rules already require Discretionary Activity Resource consent for intensive animal farming (Operative UHDP rule RPROZ-MC-2, Plan Change 50 rule RPROZ18). Concerned the requirements for registration and monitoring are too onerous for non-commercial farms and will result in the underuse of farming capacity to avoid expenses. Considers the imposition of these rules to be contrary to the NPSHPL and not meeting the Council's obligation under RMA s66(1)(ea) as there is a lack of evidence showing current stocking rates of small farms are directly causing adverse effects on water quality.	Not Stated
S32.019	12 Schedules	Schedule 35: Small farm registration.	Oppose	Comments relating to land use farm plans are as follows: Concerned PC1 requirements such as documentation, mapping, evidentiary, certification and auditing will burden rural landowners. Considers that documentary requirements will involve direct and Council recovery costs.	Requests the Council review the list of planning, documentation, and certification requirements using the requirements in National Direction as a baseline. Considers that additional requirements should be justified through on the basis of actual scientific evidence that the proposals will achieve the environmental improvements sought in the plan and a robust analysis demonstrating that they are the best practical way of achieving those outcomes.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Documentary requirements identified include: Erosion Risk Treatment Plans Erosion Sediment and Management Plans Farm Environment Plans Farm Registrations Freshwater Farm Plans Small Farm Registrations Small Stream Riparian Programmes. Considers that whilst part of the requirement is imposed by national direction, the names, requirements and application do not align with National Direction. Considers there to be no analysis of the costs of implementing the regime and states that the Section 32 analysis makes it clear that the effectiveness of the regime in achieving environmental outcomes has not been established. Considers there to be no reasonable basis for council to impose the farm planning regime on the rural community.	Requests council removes the documentary requirements unless they are directly mandated by National Directions and do not directly duplicate National Environmental Standards requirements. Requests council reviews the specific additional requirements to ensure that they are necessary, can be demonstrated to be effective, and are the most efficient way to achieve the stated purpose. States once this review is complete, the council can introduce new requirements, by variation or plan change.
S32.020	12 Schedules	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-	Oppose	Comments relating to land use farm plans are as follows: Concerned PC1 requirements such as documentation, mapping, evidentiary, certification and auditing will burden rural landowners. Considers that documentary requirements will involve direct and Council recovery costs. Documentary requirements identified include: Erosion Risk Treatment Plans Erosion Sediment and Management Plans Farm Environment Plans Farm Registrations Freshwater Farm Plans	Requests the Council review the list of planning, documentation, and certification requirements using the requirements in National Direction as a baseline. Considers that additional requirements should be justified through on the basis of actual scientific evidence that the proposals will achieve the environmental improvements sought in the plan and a robust analysis demonstrating that they are the best practical way of achieving those outcomes. Requests council removes the documentary requirements unless they are directly mandated by National Directions and do not directly duplicate National Environmental Standards requirements. Requests council reviews the specific additional

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Porirua Whaitua.		Small Farm Registrations Small Stream Riparian Programmes. Considers that whilst part of the requirement is imposed by national direction, the names, requirements and application do not align with National Direction. Considers there to be no analysis of the costs of implementing the regime and states that the Section 32 analysis makes it clear that the effectiveness of the regime in achieving environmental outcomes has not been established. Considers there to be no reasonable basis for council to impose the farm planning regime on the rural community.	requirements to ensure that they are necessary, can be demonstrated to be effective, and are the most efficient way to achieve the stated purpose. States once this review is complete, the council can introduce new requirements, by variation or plan change.

S249 Isabella Cawthorn

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S249.001	General comments	General comments - fresh water	Support	Strongly supports the water and indigenous biodiversity elements of PC1 .	Not stated
S249.002	General comments	General comments - water bodies	Support	Strongly supports the objectives for all the catchments in Te Upoko o te Ika.	Suggests that where the phrase "on a trajectory of measurable improvement" is used, the definition of "measurable" includes something statistically significant or an appropriate magnitude measure.
S249.003	General comments	General comments - target attribute states	Support	Strongly supports the Target Attribute States proposed for all catchments except for Te Awarua o Porirua in which the submitter would like strengthened.	Strengthen target attribute states for Te Awarua o Porirua
S249.004	General comments	General comments	Support	Considers Te Mana o te Wai to be a vital overarching and underpinning concept for how we think about and deal with water.	Make the hierarchy of obligations in Te Mana o te Wai clearer in the definitions and objectives, including prioritising mana whenua and their whakapapa and tikanga in decision-

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		- water bodies			making for water. Make clearer that Te Mana o te Wai guides all policy, plans and consents that impact on three waters, from the earliest stage of consideration and before options are presented to regional council, Planning Committee or consulted on with communities.
S249.005	General comments	General comments - stormwater management	Not Stated	Requests standards be developed for the minimum performance of stormwater retention devices and other green infrastructure.	Develop standards for the minimum performance of stormwater retention devices and other green infrastructure
S249.006	General comments	General comments - stormwater management	Not Stated	Requests standard be developed, and elements required for building consents, to reduce/prevent copper and zinc getting into stormwater. Considers MBIE should be promoting this kind of source control.	Develop standard to reduce/prevent copper and zinc getting into stormwater.
S249.007	General comments	General comments - wastewater	Not Stated	Considers the disposal of sewage sludge on land, and systems that hold / treat wastewater on site, are important and haven't been provided enough coverage.	Not stated
S249.008	General comments	General comments - rural	Not Stated	Request having a reference to the guidelines for Beneficial Use of Organic Materials on Productive Land (due next year) as a minimum	Provide a reference to the guidelines for Beneficial Use of Organic Materials on Productive Land as a minimum
S249.009	General comments	General comments - current legislation	Not Stated	Considers any duplication between the statutory requirements, plans, policies and processes of the Water Services Entities Act 2022 and requirements of the RMA, Spatial Planning Act, Natural Built Environments Act (including regional councils' freshwater plans) should be avoided. Considers There's a similar potential for duplication	Avoid duplication of legislation

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				between the requirement for asset management plans (AMPs),. Suggests if AMPs are not doing this job, they should be rewritten so they're strategically tied to manifesting the objectives of the relevant FMU or pFMU.	
S249.010	General comments	General comments - wastewater	Not Stated	Considers the construction, performance monitoring, inspection and pinging (enforcement) of on-site wastewater treatment facilities is crucial given they reduce peak loads on vulnerable infrastructure (especially enabling intensification), and their potential to pollute the wider network if badly built and not maintained. Requests the development of minimum standards for the construction of on-site wastewater treatment facilities, and standardised consent conditions for their operation and monitoring to ensure they continue to operate as intended.	Requests the development of minimum standards for the construction of on-site wastewater treatment facilities, and standardised consent conditions for their operation and monitoring to ensure they continue to operate as intended.
S249.011	General comments	General comments - urban development	Support	Considers effects of stronger rules on urban development and infrastructure is excellent. Considers rules that improve the ways land and water is used must be used.	Not stated
S249.012	General comments	General comments - economic cost/impact	Support	Considers the costs imposed on developers are important. Supports imposed costs that prevent developments from affecting wai as it will encourage them to innovate and improve processes, or exit the market.	Not stated
S249.013	General comments	General comments - urban development	Support	Considers density done well enables sophisticated water management.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S249.014	General comments	General comments - overall	Support	Considers cost should not be pushed back on the environment. Considers there is an opportunity for a better system to be built with PC1.	Not stated
S249.015	6 Other methods	Method M45: Funding of wastewater and stormwater network upgrades	Support	Considers Method M45 a good thing with regards to funding	Avoid funding gaps
S249.016	8 Whaitua Te Whanganui-a-Tara	8.3.7 Take and use of water	Support	Support the rules in Schedule P (Efficient use). Seeks an enabling framework for allocating freshwater in the PC1 that manifests the hierarchy of obligations of Te Mana o Te Wai, and motivates people and organisations within a catchment to use water much more efficiently is needed. Suggest the frame work also needs to account for leaks and take a precautionary approach given climate change.	Not stated
S249.017	9 Te Awarua-o-Porirua Whaitua	Table 9.2: Target attribute states for rivers.	Amend	Considers the term maintain is used to frequently versus improve. Suggests the term improve if used may be able to drive more strongly a higher-performing urban form in any greenfield development.	Not stated

S259 Isla Walker

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S259.001	General comments	General comments – stormwater	Oppose	Considers the plan overly restrictive in relation to impervious surfaces as these surfaces help high volumes of rainfall-runoff quickly and reduce inundation contributing to landslips. Objects to existing impervious areas should not be included.	Not Stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		management			
S259.002	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Oppose	Objects to WH.R5, specifically the area of 1000m2.	Amend rule to increase area
S259.003	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Oppose	Objects to WH.R6 and the area being so small.	Increase area above 5000m2.

S052 Jeremy Collyns

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S52.001	General comments	General comments - overall	Not Stated	Supports submissions from National New Zealand Farm Forestry Association and Wellington branch of the New Zealand Farm Forestry Association	Not stated
S52.002	General comments	General comments - economic cost/impact	Oppose	Believes costs and restrictions of PC1 would make their forestry operation uneconomic and limit future income	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S52.003	General comments	General comments - overall	Oppose	Concerned rules governing forestry in PC1 would render interest in land incapable of reasonable use	Not stated

S094 Jo McCready

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S94.001	General comments	General comments - consultation	Oppose	Concerned with consultation and insufficient time for the community/landowners to fully consider the implications of the policies and rules proposed in PPC1 before entering the formal submission process. Considers GWRC has not undertaken appropriate consultation with affected parties.	Withdraw PC1 and undertake an effective period of consultation.
S94.002	General comments	General comments - maps	Oppose	Considers the maps provided within PC1 difficult to decipher at property level. Concerned with difficulty for landowners to determine how they might be affected.	Not stated.
S94.003	General comments	General comments - overall	Oppose	Considers heavy reliance on modelling to inform the policies and rules rather than emphasising collection of reliable data and applying appropriate actions.	Not stated.
S94.004	General comments	General comments - economic cost/impact	Oppose	Considers inadequate information on clearly committed resourcing from GWRC for implementation of PC1, leaving landowners unsure of the costs (financial and time) associated with PC1.	Not stated.
S94.005	General comments	General comments - overall	Oppose	Considers lack of information on support resourcing, including monitoring the implementation of PC1, means it is likely to potentially penalise those engaging proactively and using good management practices while failing to identify or deal with those engaging in poor management practices unless there are very blatant breaches.	Not stated.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S94.006	General comments	General comments - overall	Oppose	Considers overall emphasis within PC1 is on regulatory methods and "requirements" on landowners rather than incentives to engage best practice. Considers better outcomes would be achieved weighted in accordance with Recommendations 58, 59, 60, 61 and 64 of Te Awarua-o-Porirua Whaitua Implementation Programme. Considers focusing on resourcing positive supports and actions rather than enforcements.	Not stated.
S94.007	General comments	General comments - economic cost/impact	Oppose	Concerned not all costs have been economically quantified and the environmental and cultural benefits have not been quantified through a specialist economic impact assessment. Considers if the benefits had been quantified, the benefits would not outweigh the costs associated with improving the environment in the manner directed by NPS-FM - particularly urban areas. Concerned of financial cost to ratepayers.	Produce a cost-benefit exercise and follow a clear concept of financial accountability.
S94.008	General comments	General comments - definitions	Amend	Notes within the document there are a number of references to small rivers, less than 1 metre wide. Notes there is nowhere within the documents that states what the minimum size is and considers it unacceptable to have an open-ended definition for a minimum.	Amend: Clarify the definition upon which other regulations rely eg. Stock exclusion and fencing rules.
S94.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Not Stated	Considers other stock not mentioned are exempt from all rules.	Confirm the rules are exclusive to these animals.
S94.010	9 Te Awarua-	9.3.4 Land uses	Amend	Considers there are different pest plants within the region. Considers some pest plants threaten	Add definition of pest plants.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua			establishing native vegetation whilst others nurse revegetation.	
S94.011	9 Te Awarua-o-Porirua Whaitua	Rule P.R17: Vegetation clearance on highest erosion risk land - controlled activity.	Amend	Considers conditions are arbitrary with no factual basis.	Amend conditions to allow for an individual property scale response.
S94.012	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Amend	Considers conditions are arbitrary with no factual basis. Considers the size of earthworks have no relation to property size. Considers weather window irrelevant as bad weather can occur at anytime of year.	Amend/remove these conditions.
S94.013	9 Te Awarua-o-Porirua Whaitua	Rule P.R27: The use of land for farming activities - discretionary activity.	Amend	Considers where monitoring sites are not defined, concentration should be demonstrated at property level to determine if it exceeds the target attribute state. Considers permitted changes in land use should be allowed if the properties' activities do not contribute to increasing concentrations.	Amend a) and b) to allow for an individual property scale response.
S94.014	12 Schedules	Schedule 35: Small farm registration.	Oppose	Notes landowners have to provide complex range of data including average stocking rates, perform calculations relating to Nitrogen emitting from the property and are required to calculate effective grazing areas, map the property boundaries and show waterbodies where stock exclusion is required under new rules and to show the location of fences relative to the waterbodies. Notes there will be few in the community who will have the level of expertise required to perform the complex mathematical calculations to collate the raft of data required or produce accurate maps, especially given the undulating nature of the terrain. Notes	Delete this requirement

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				GWRC have not produced the systems necessary to record the information. Notes a resource consent application takes time, costs money and is beyond the technical abilities of most individuals. There is no guarantee it will be approved and if it is, it may contain onerous conditions.	

S276 Jody Louise Sinclair, Joshua William Lowry, Anne Friedarika Sinclair & Tracey Lynn Browne

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S276.001	General comments	General comments - consultation	Oppose	Concerned about the lack of consultation on PC1.	Withdraw PC1
S276.002	General comments	General comments - current legislation	Oppose	Questions the legality of the process undertaken by GWRC, citing recent Environment Court decisions.	Remove clauses that are demonstrably regulating by fiat and demonstrate respect for the rule of law.
S276.003	General comments	General comments - current legislation	Oppose	Considers in any given catchment there will be upstream and downstream properties and very few indicative monitoring sites. Notes that the Managaroa catchment and Akatarawa Valley are complex networks of waterways and all properties in the catchment will be assessed, based on the downstream results from this single monitoring point and penalised accordingly. Considers this unacceptable.	Remove all such clauses where GWRC has failed to establish an adequate network of monitoring sites.
S276.004	General comments	General comments - current legislation	Oppose	Considers GWRC has decided that freshwater Management is pre-eminent and over-rules other national Policy Statements. Considers GW has erroneously decided to regard clauses (a), (b), and (c) of the Te Mana o te Wai hierarchy as mutually exclusive rather than regarding them as equally weighted and inter-	Give equal weighting to all government legislation and disregard regulation by committee.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				dependent. Considers that GWRC has chosen to give maximum weight to one piece of legislation and has exacerbated that choice by taking in to account an opinion by one Whaitua in respect of levels of copper and zinc in stormwater which are not recognised in NPS-FM.	
S276.005	General comments	General comments - overall	Oppose	Considers there is confusion among GWRC staff and that contradictory advice has been given relating to the immediate legal effect of provisions and the fencing of waterways.	Delete the statement that all rules have immediate legal effect and substitute "all rules in this plan change will be held in abeyance pending the plan change passing through all stages required by the RMA".
S276.006	General comments	General comments - rural	Oppose	Considers GWRC do not know where sediment originates from and are guessing that it comes from farming activity and making the assumption that all sediment in rivers is the result of human activity. Considers it is important to take into account that a proportion arises from natural erosion processes and that it's important to form a complete picture of all factors within the catchments, both natural and man made. Considers within each of the Mangaroa and Akatarawa catchments GWRC should establish at least 3 monitoring points and accrue a significant data base to be able to identify the source of any quality reduction.	Within each of the Mangaroa and Akatarawa catchments, establish at least 3 monitoring points and accrue a significant data base to be able to identify the source of any quality reduction. Defer any further action on PC1 pending the gathering of an effective database.
S276.007	General comments	General comments - overall	Oppose	Considers there are errors in drafting which change the intended meaning	Review and undertake an edit of PC1
S276.008	General comments	General comments - rural	Oppose	Considers there is insufficient data to identify the point of origin of any contamination and PC1 requires registered farms to collect the data for GWRC at no cost to GWRC. Considers there are indicators from primary contact sites along the Hutt River that paint a clear picture and suggests this establishes that whatever contamination is present in the lower reaches is not originating from the farming communities of Akatarawa and Mangaroa.	Move away from attributing contamination problems to farming and re-focus on the more complex issues of urban sources.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Suggests a disproportionate amount of effort in to trying to solve a problem that does not exist.	
S276.009	General comments	General comments - water bodies	Oppose	Notes there are a number of references to small rivers, less than 1 metre wide but nowhere within the PC1 states what the minimum size is. Considers it unacceptable to have an open-ended definition for a minimum.	Clarify the definition upon which other regulations rely eg. Stock exclusion and fencing rules. Provide a clear minimum width for small rivers
S276.010	General comments	General comments - rural	Oppose	Considers section 6.9 of the Section 32 report - (Sources of nitrogen and other contaminants) establishes that none of the measures aimed at the Mangaroa Valley and Akatarawa Valley farming community are justified. Considers the proposed measures will achieve little at an unquantified cost.	Withdraw all measures targeted at the Upper Hutt farming community.
S276.011	General comments	General comments - consultation	Oppose	Considers there is no quantification for the benefits or quantification of the costs and that just because GWRC consider they are obliged to do something is not a valid reason to have no idea of the value or cost of the exercise.	Produce a thorough cost-benefit exercise and recognise ratepayers are not a limitless source of funds.
S276.012	General comments	General comments - rural	Oppose	Considers the proposed stocking unit is unreasonable and the allocation of SU/HA is too low, especially compared to other regions.	Remove the proposed stocking unit rate and allocation from the plan.
S276.013	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Amend	Notes the only animals referenced are cattle, farmed deer and farmed pigs. Suggests the community takes this to mean all other animals are exempt from the rules.	Confirm that the rules are exclusive to these animals.
S276.014	12 Schedules	Schedule 35: Small farm registration.	Oppose	Concerned small farms registration will be too extensive and complex for lay people and many landowners will not have the information required or know how to collate the data required. Also concern surrounding the lack of developed systems from GWRC to record the information.	Remove the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating regulations.

S250 John and Jacqueline Diggins

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S250.001	General comments	General comments - overall	Oppose	Supports ensuring high water quality and protecting waterways from sediment discharge but questions the data GWRC is relying on and the lack of consultation.	Not stated.
S250.002	General comments	General comments - consultation	Oppose	Concerned about lack of consultation from GWRC and onerous set of requirements impacting rural land owners.	Withdraw PC1 and then engage with representative groups and wider public.
S250.003	General comments	General comments - water bodies	Oppose	Cites GWRC Environment Court cases. Is concerned GWRC is trying to introduce rules, and methods to classify all streams, drains, ditches and ephemeral flows as rivers and that this is not consistent with the court rulings or judges findings.	A clear definition of what constitutes a natural waterway needs to be confirmed before PC1 is approved.
S250.004	General comments	General comments - current legislation	Oppose	Suggests GWRC is contravening the Bill of Rights and there is erosion of property rights. Concerned PC1 is proposing sanctions against property owners on factors they have no control over. Suggests within any given catchment there will be upstream and downstream properties and very few indicative monitoring sites. Concerned properties will be assessed based on downstream results from a single monitoring point and penalised accordingly.	Remove all clauses in PC1 where GWRC has failed to establish an adequate network of monitoring sites.
S250.005	General comments	General comments - freshwater	Oppose	Notes information regarding the Mangaroa and Akatarawa catchment. Considers the headwaters of the catchments are 20km from the monitoring points. Cites a GWRC Zoom Q&A session. Considers GWRC is assuming that all sediment in rivers is the result of human activity. Suggests there is a strong probability that human activity can	Put PC1 on hold until GWRC has established at least 3 monitoring points and has a significant data base to identify source of water quality reduction within the Mangaroa and Akatarawa catchments.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				contribute to the sediment load but it is important to consider that a proportion arises from natural erosion processes. Considers it vital that GWRC has a complete picture of all factors within the catchments, both natural and man-made rather than assuming all sediment is a result of human activity.	

S050 John Anthony Carrad

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S50.001	9 Te Awarua-o-Porirua Whaitua	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Amend	For clauses (a) and (b), nitrogen doesn't come from animals, it is supplied to soil by legumes or fertiliser. Nitrogen leaching must be accounted for in a scientifically robust manner.	Upgrade nitrogen leaching accounting method.
S50.002	9 Te Awarua-o-Porirua Whaitua	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high	Oppose	Concerns regarding property and economic consequences due to requirements of schedule 36. Considers High and highest erosion risk maps are overstated and inaccurate.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		risk of erosion.			
S50.003	12 Schedules	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Oppose	Concerns regarding property and economic consequences due to requirements of schedule 36. Considers High and highest erosion risk maps are overstated and inaccurate.	Not stated

S117 John Bowen

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S117.001	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Oppose	Considers there to be an insufficient amount of water quality monitoring sites in the Makara River. Suggests that data from the one and only monitoring site does not adequately show where sediment and contaminants are entering the river. Suggests that riverbanks washing away due to heavy rainfall or floods may be getting overlooked.	Increase the amount of water monitoring sites in the Makara catchment
S117.002	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges	Oppose	Considers the local community to be the most capable in determining how to best enhance and protect the local environment. Measures such as native planting and fencing have already been implemented.	Remove the regulatory approach under PC1

		from farming activities on land with high risk of erosion.			
S117.003	General comments	General comments - consultation	Oppose	Considers that the consultation process was insufficient. States PC1 should have been emailed to property owners to provide them with sufficient time to review it. Property owners with farms in Makara should also have been notified of PC1 as they will be impacted.	Improve the consultation process with the community.

S181 John Boyle

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S181.001	General comments	General comments - overall	Not Stated	Supports the Maymorn Collective submission in full	Not stated
S181.002	General comments	General comments - overall	Oppose	Opposes Plan Change 1	Not stated
S181.003	General comments	General comments - consultation	Not Stated	Concerned with the lack of consultation and consideration for the UHCC Proposed Plan Change 50 Rural (PC50r) which PC1 is inconsistent with	Withdraw PC1 and conduct appropriate consultation and engagement.
S181.004	General comments	General comments - unplanned greenfield development	Oppose	Opposes 'unplanned greenfield development' being a prohibited activity and believes each site should be considered individually on its merits.	Amend PC1 to allow to allow applications for new 'unplanned greenfield development'. Exclude areas covered by PC50 from 'unplanned greenfield development'

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S181.005	General comments	General comments - economic cost/impact	Oppose	Questions the credibility of PC1 due to the lack of a specialist economic impact assessment to quantify environmental and social benefits.	Withdraw PC1 and undertake a publicly disclosed detailed economic, social and cultural impact assessment that informs a revised plan change
S181.006	General comments	General comments - overall	Amend	Concerns with the drafting errors and failure to define key terms in PC1	PC1 is redrafted correctly and resubmitted for consultation.
S181.007	General comments	General comments - overall	Not Stated	Suggests PC1 is inconsistent with the incoming Government's 2023 election platform related to unlocking land for housing	Any decision that prohibits the ability to unlock land for housing as proposed by PC1 should be revised
S181.008	General comments	General comments - overall	Not Stated	Notes an absence of detail in PC1 around GWRC managed land.	Not stated
S181.009	General comments	General comments - water bodies	Not Stated	Concerned that 1080 drops on GWRC managed land will affect the waterways and soil quality.	Not stated

S179 John Coveney

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S179.001	General comments	General comments - overall	Not Stated	Considers regional bodies are overregulating.	Not stated
S179.002	General comments	General comments - fresh water	Not Stated	Where resource consent is required to take water, there should be evidence-based data showing detrimental effects. Opposes blanket regulation. Considers restrictions to take water from an allocated source should only be put in place when data or science shows there is a detrimental effect to that waterway, aquifer or ecosystem and/or the upstream or downstream cumulative effect.	Not stated

				Considers the current methodology results in costs relates to offsets, lost production and wasted infrastructure. Considers the status quo should apply until data or science proves otherwise and blanket regulation is opposed.	

S017 John Easther

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S17.001	2 Interpretation	Highest erosion risk land (plantation forestry)	Oppose	Considers Makara and Ohariu catchments are faulted with variable aspects and topography. Potential erosion varies within sub catchments, which cannot be determined through aerial scanning data.	Considers erosion potential of all land must be based on evidence from site investigation. Considers Map 92 is not fit for purpose other than as a tool to indicate where specific site investigation should be undertaken.
S17.002	2 Interpretation	Highest erosion risk land (pasture)	Amend	Considers Makara and Ohariu catchments are faulted with variable aspects and topography. Potential erosion varies within sub catchments, which cannot be determined through aerial scanning data.	Considers erosion potential of all land must be based on evidence from site investigation. Considers Map 92 is not fit for purpose other than as a tool to indicate where specific site investigation should be undertaken.
S17.003	2 Interpretation	High erosion risk land (pasture)	Amend	Considers Makara and Ohariu catchments are faulted with variable aspects and topography. Potential erosion varies within sub catchments, which cannot be determined through aerial scanning data.	Considers erosion potential of all land must be based on evidence from site investigation. Considers Map 92 is not fit for purpose other than as a tool to indicate where specific site investigation should be undertaken.
S17.004	2 Interpretation	Highest erosion risk land (woody vegetation)	Amend	Considers Makara and Ohariu catchments are faulted with variable aspects and topography. Potential erosion varies within sub catchments, which cannot be determined through aerial scanning data.	Considers erosion potential of all land must be based on evidence from site investigation. Considers Map 92 is not fit for purpose other than as a tool to indicate where specific site investigation should be undertaken.
S17.005	2 Interpretation	Hydrological control	Amend	Considers it is not possible to consider hydrological control without considering formative effects of extreme floods and droughts.	Considers interpretation needs to include flood risk management. Hydrological controls must consider effects of the Makara Stream mouth opening / closure on deposition and oxygen depletion.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S17.006	2 Interpretation	Stormwater	Amend	Considers current interpretation is an urban concept that is not relevant to rural catchments.	Change ~~Stormwater~~ to **Runoff** or alternatively introduce definition of Runoff that is appropriate to rural catchments.
S17.007	2 Interpretation	Whaitua	Amend	Considers the Makara/Ohariu catchments are isolated from the adjoining Wellington urban catchments and cannot be managed as an integrated system.	Create a separate Whaitua for the Makara/Ohariu catchment
S17.008	3 Objectives	Amendments to Chapter 3 - Objectives	Amend	Considers reforestation through retirement can take hundreds of years. Considers any disturbance of the stream bed yields high levels of decolouration which will exceed the generic requirements in the plan change. Considers provisions of the plan change are completely unrealistic and are not based on evidence. Considers the "reasonable timeframe" default of 2050 referred to in many objective statements is not achievable within the Makara / Owhariu whaitua. Considers revegetation of stream channels and adjacent floodplains will take many years.	Considers rural area objectives should be described as aspirational to be achieved over generations of landowners.
S17.009	9 Te Awarua-o-Porirua Whaitua	Policy P45: Protecting trout habitat.	Oppose	Considers the protection of introduced species is not relevant to freshwater policy.	Delete policy or amend to make clear this policy applies only to indigenous trout, not to introduced species.
S17.010	5.2 and 5.3 Discharges to land and water and land use rules	5.2 and 5.3 Discharges to land and water and land use rules	Amend	Concerned the objectives to establish vegetation and revegetation restricts machinery access in water which sometimes cannot be avoided. Suggests provisions mitigating adverse effects including limiting access to remediation or prevention of flood damage and limiting access to outside spawning periods and weekends to minimise effects on recreational use.	Suggests separate provisions are required for working in streams within the Makara/Ohariu whaitua.
S17.011	6 Other methods	Method M41: Identifying and respondin	Amend	Concerned about the reliance on the use of a single monitoring site to support the provisions in PC1. Considers more monitoring sites are required (provides examples).	Water quality monitoring in the Makara/Ohariu catchment must be replicated at a sub catchment level to identify causes of degradation. Monitoring sites should include equipment and alarms which allow GWRC to respond within the timeframe required to identify adverse effects.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		g to degradation in freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.			
S17.012	6 Other methods	Method M42: Small farm property registration within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	The points in the attached document have been listed as new submission points by GWRC at the beginning of this submission.	Make council responsible for the preparation and registration of small farms plans in consultation with the property owner.
S17.013	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Amend	Concerned about the reliance on the use of a single monitoring site to support the provisions in PC1. Water quality targets and timeframes are unrealistic.	Targets for Makara Stream in table 8.4 should be tagged as indicative and non-operational until targets can be determined to represent sub catchments at the confluences of major tributaries. Timeframe be determined by implementing intergenerational land use changes. The specified timeframe of 2040 should be replaced with an indicative figure, suggesting 2100 may be achievable.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S17.014	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Amend	Considers the requirements and benefits from implementing policies WH.P21-WH.P24 should be funded by regional and national communities.	Clarification that implementation and costs of implementation of policies in 8.2.4 are funded by Council.
S17.015	8 Whaitua Te Whanganui-a-Tara	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Amend	Considers pastural land should be measured by the area of land used for that purpose not the size of the block of land.	Clause (c) be clarified to refer to contiguous parcels for a specified land use not the area of the titles the areas are within.
S17.016	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	Plans should be used to show areas which are subject to further investigation not those which are subject to contingent policies and rules.	Plans associated with erosion risk attached to PC1 should be labelled indicative to assist with interpretation and not be part of the plan change.
S17.017	General comments	General comments - overall	Not Stated	Considers plan change must be amended to include statutory provisions for central and local government funding for retirement of land, land-use changes, certification costs and mitigation measures required to meet objectives.	Not stated.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S17.018	General comments	General comments - rural	Not Stated	Considers mandated retirement of erosion prone pastural land into permanent forest must be a regional/national responsibility planned and funded in accordance with a risk based regional plan.	Not stated.
S17.019	General comments	General comments - rural	Not Stated	Feels compensation for land retirement, covering loss of production and income and options for property purchase, should be included within the plan change or supporting regulation before plan change is implemented.	Not stated.
S17.020	General comments	General comments - target attribute states	Not Stated	Concerned about timeframes to achieve target outcomes in the Makara Catchment. Generic figures in plan change should be replaced with guidance notes.	Not stated.
S17.021	General comments	General comments - rural	Not Stated	Assumptions of silt leading to afforestation or mandated retirement of pastural land must be replaced with evidence from sub catchments and tributaries.	Not stated.
S17.022	General comments	General comments – stormwater management	Not Stated	Considers the production of peak runoff to be a greater risk to the community than potential production of silt.	Not stated.
S17.023	General comments	General comments - overall	Not Stated	The points in the attached document have been listed as new submission points by GWRC at the beginning of this submission.	Not stated.
S17.024	General comments	General comments - overall	Not Stated	References the Rivers Control Act 1941 being a precedent for management of erosion and protecting property from flood damage.	Not stated.
S17.025	General comments	General comments - rural	Not Stated	Not Stated	Not stated.
S17.026	General comments	General comments - rural	Not Stated	Concerned that any use of streams including recreational uses will exceed requirements in PC1	Not stated.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				and the PC1 provisions are unrealistic and not based on evidence.	
S17.027	General comments	General comments - rural	Not Stated	Not Stated	Not stated.
S17.028	General comments	General comments - rural	Not Stated	Not Stated	Not stated.
S17.029	General comments	General comments - overall	Not Stated	Concerned about the time it will take to achieve PC1's long-term goals and that the timeframes and expectations on landowners are unrealistic.	Not stated.
S17.030	General comments	General comments - overall	Not Stated	Considers PC1 needs to include provisions to address landowners being penalised for use of the land while those with lease agreements (using windfarms as an example) can avoid liability for diverting revenue into reforestation.	Not stated.
S17.031	General comments	General comments - overall	Not Stated	Considers land use changes that deal with runoff and reducing flood peaks in the Makara/Ohariu catchments will also deliver PC's objectives of reducing silt loads. Concerned PC1's focus on grade and cover of land (and not reducing flood flows) will not reduce transportation of silt.	Not stated.

S034 John Hill

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S34.001	General comments	General comments - overall	Support	Legislation or council directions must be clear and precise.	Legislation or council directions must be clear and precise.
S34.002	General comments	General comments - overall	Support	The plan change should not be able to be misinterpreted or used to support the ideology of any member or group within GWRC	Plan change should not be able to be misinterpreted or used to support the ideology of any member or group within GWRC
S34.003	General comments	General comments - overall	Support	An independent commissioner should be available to manage misuse or interpretation of rules.	Seeks access to a commissioner where situations outlined in submission occur.

S237 John Turkington Limited

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S237.001	General comments	General comments - overall	Not Stated	Supports submissions from China National Forestry Group, Forest Enterprises and Juken New Zealand	Not stated
S237.002	General comments	General comments - current legislation	Not Stated	Concerned lack of evidence and justification for forestry restrictions and how NES-CF controls are insufficient for managing forestry and associated effects.	Not stated
S237.003	General comments	General comments - current legislation	Not Stated	Considers PC1 duplicated existing controls under NES-CF including use of erosion mapping and management plan requirements.	Not stated
S237.004	General comments	General comments - economic cost/impact	Not Stated	Concerns with lack of evidence provided by GW on environmental effects from forestry.	Not stated
S237.005	General comments	General comments - current legislation	Not Stated	Promotes the correct application of stringency under the NES-CF for specific additional controls to the existing NES-CF framework to address water quality concerns, as the preferred approach and an alternative to the PC1 consented regime proposed.	Not stated
S237.006	General comments	General comments - water bodies	Not Stated	Supports principles of Te Mana o te Wai. Considers any rule, policy or objective of PC1 intended to give effect to Te Mana o te Wai must demonstrate it is necessary to do so.	Not stated
S237.007	General comments	General comments - target attribute states	Not Stated	Considers any rule, policy or objective of PC1 intended to give effect to a specified TAS must demonstrate it is necessary. Suggests scientific data supports that current forest landuse, controls, and management practices, as regulated under the NES-CF, are sufficient to achieve the desired target attribute state for	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				freshwater clarity Notes the Section 32 report and scientific evidence (Freshwater quality monitoring technical report) that commercial forestry as a land use, is beneficial for water quality; and that planting commercial forests (afforestation and replanting) should be encouraged, and not restricted or prohibited, by the NRP. Question if any of the amended policies, objectives and rules relating to commercial forestry land use are necessary to achieve target attribute states in other FMU or part-FMU. Opposes any proposed or amended rules in PC1 for commercial forestry, on the basis they are not necessary for achieving the target attribute state for visual clarity and total suspended sediment, and current National Standards are appropriate for managing forestry activities and their effects.	
S237.008	General comments	General comments - overall	Not Stated	Notes importance that polices, objectives or rules related to commercial forestry are supported by appropriate empirical evidence. Considers the collaboration reports suggests no scientific relationship between erosion risk, sediment delivery (connectivity), sediment yield, or receiving environment target state attributes, such as visual clarity. Question how spatial model of erosion risk can apply as a tool for managing water quality from land used for commercial forestry operations, particularly without any evidence GWRC having given due consideration to existing literature on connectivity and sediment yield. Opposes rules related to identified highest erosion risk land, land use and discharge consent thresholds, and erosion and sediment management plans, as they relate to commercial forestry activities	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				and do not consider management practices beyond erosion risk, and are already adequately controlled for within NES-CF. Considers the Section 32 Report, does not provide evidence or justify that existing commercial forestry contributes to sedimentation and current forestry management practices and the regulatory framework are not adequate to address the improvements needed. Considers councils data suggests the existing regime controlled by NES-CF does not appear to contribute any additional sediment that would be necessary to address to achieve water clarity targets within catchments monitored with that land use.	
S237.009	General comments	General comments - water quality improvements	Not Stated	Seeks rules must be consistent with existing operating framework of NES-CF. Notes the sediment discharge provisions of the NES-CF form an important component of the permitted activity standards for forestry earthworks under the current regulatory regime, and apply irrespective of the identified erosion susceptibility of the land. Considers Council has overlooked role of water quality standards (namely permitted activity discharges) already provided for by NES-CF. Questions if further deviation from standards currently expressed by the National Standards is necessary or defensible. Considers as well as unnecessarily overriding existing discharge standards of NES-CF, PC1 is also duplicating existing requirements of National Standards for forestry operations to have a management plan address erosion and sedimentation from land disturbing activities. Considers as well as unnecessarily overriding existing discharge standards of NES-CF, PC1 is also duplicating existing requirements of National	Seeks rules must be consistent with existing operating framework of NES-CF.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Standards for forestry operations to have a management plan address erosion and sedimentation from land disturbing activities. Considers there is no evidence provided in Council reports that current NES-CF framework for managing erosion, sediment, and water quality is deficient either in current monitoring data or desired future state. Also notes no evidence provided by Council that existing Forestry Earthworks and Harvest Management Plans within NES-CF is insufficient for managing forestry activities.	
S237.010	General comments	General comments - current legislation	Not Stated	Notes PC1 must be implemented in accordance with statutory provisions. Notes National Environmental Standards take primacy over Plan rules unless the standards expressly provide otherwise, and PC1 should complement existing NES-CF framework and only introduce more stringent rules where necessary to achieve an objective developed to give effect to NPS-FM. Concerned current provisions seek to replace the current permitted activity approach of National Instruments leading to regulatory inconsistency. Notes whilst regulation 6 of NES-CF allows for a council to provide more stringent rules to meet an objective giving effect to NPS-FM, there is a process to be undertaken by council to justify any application of stringency, refers to Section 32 (4) of RMA. Submitter considers none of the proposed changes necessary, or validly justified. Considers Council has not undertaken any of its own research into how NES-CF provisions have been operating and has failed to provide evidence to support these proposed changes, including evidence to show current regulatory regime is not sufficient to achieve a plan objective. Suggests proposed or amended policies, objectives or rules of PC1 as they relate to commercial forestry	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				are not necessary or appropriately justified in accordance with the statutory provisions of Section 32(4) of RMA that apply to this type of plan change.	
S237.011	General comments	General comments - current legislation	Not Stated	Considers NES-CF sufficient for managing forestry activities and notes Council have not provided any evidence contrary to this. Seeks Council should provide evidence that NES-CF is insufficient to meet the objectives for water quality, ecosystem health and mana whenua values in these FMUs before looking to pursue this plan change process further. Alternatively, seeks Council utilise stringency ability under NES-CF to develop more stringent rules for specific controls, noting Council must provide evidence to show the NES-CF controls are not sufficient to achieve a specific plan objective to give effect to NPS-FM in order to apply a more stringent rule.	Seeks Council provide evidence that NES-CF is insufficient to meet the objectives for water quality, ecosystem health and mana whenua values before progressing with PC1. Alternatively, Seeks Council should utilise stringency ability under NES-CF to develop more stringent rules for specific controls.

S253 John Western

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S253.001	General comments	General comments - overall	Not Stated	Submitter values the water quality values of the following areas for contact recreation and ecosystem health: i. Te Awakairangi / the Hutt River ii. Akatarawa River iii. Whakatikei River iv. Titahi Bay v. Lyall Bay vi. Otaki River Considers the natural form and character of these waterbodies is an important part of their value.	Requests the outstanding value of this section [Te Awakairangi / the Hutt Gorge] of river recognised in the plan.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Natural form and character creates rapids and other features of these sections of river that make them valuable for kayaking. Te Awakairangi / the Hutt Gorge is an outstanding run for whitewater kayaking, which traverses what they consider an outstanding landscape with outstanding amenity values. Would like to see the outstanding value of this section of river recognised in the plan. The natural and wildlife values of these areas are also important to submitter.	
S253.002	General comments	General comments - freshwater	Not Stated	Concerned about increased amounts of sediment in the Hutt River when flows increase and potential **e. Col**i and pathogen loads in the water. Observes algae in summer months when flows are low resulting in issues with recreation and amenity as well as human health when making contact with water. Concerns that river engineering such as railway iron degrades water quality and creates potential hazards for river users when slash and logs get caught on structures	Not Stated
S253.003	General comments	General comments - overall	Not Stated	Supports PC1 and the initiatives to improve water quality in the catchment.	Requests that GWRC initiatives are carried through to the operative plan, particularly where they protect and restore ecosystem health, contact recreation values, natural form and character, and amenity.
S253.004	General comments	General comments - freshwater	Not Stated	Supports the concept of Te Mana o te Wai and the hierarchy of obligations.	Prioritise ecosystem health and contact recreation prioritised.
S253.005	General comments	General comments - water	Not Stated	Key concerns are water quality (particularly e. coli, sediment, algal growth/periphyton, and ecosystem	Seeks the following: Recognition in the plan of the outstanding kayaking / packrafting / rafting values in the Whaitua are recognised in

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		quality improvements		health); amenity; contact recreation; and natural form and character.	the plan, particularly for the Hutt Gorge (which has outstanding kayaking, amenity, and landscape values). More work by GWRC to monitor and preserve natural character, and to strengthen objectives, policies, and rules which allow the river to function more naturally, particularly in its reaches influenced by flood protection. Targets for natural character that are similar to the sorts of targets set for water quality and seeks objectives and policies that support these. More work to enhance water quality in the coastal environment, for use of 'flat water' environments to learn and train without worrying about compromising health if contact is made with the water. Retain coastal water quality indicators/targets.
S253.006	General comments	General comments - target attribute states	Not Stated	Supports targets in the water quality target tables.	Requests as much work as possible is done through environmental limits to achieve these targets.

S028 Jonny Osborne

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S28.001	General comments	General comments - overall	Not Stated	The submitter supports the direction in Plan Change 1.	Councillors to continue to support these changes through to their implementation.
S28.002	General comments	General comments - overall	Not Stated	Considers addressing matters like aging and leaky infrastructure, inappropriate urban development and poor land use practices takes a strong (and enforced) regulatory backbone.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S28.003	General comments	General comments - overall	Not Stated	Supports measures that will end harmful wastewater entering directly into streams and coastal waters, water sensitive urban design implemented as the norm across the region, and rural and forestry practices improved so they no longer harm waterways and the wildlife.	Not stated
S28.004	General comments	General comments - overall	Not Stated	Considers the changes will be expensive but that rates cannot continue to be raised and the regulations should not be watered down. Supports the timeframes for achieving the target attribute states set out in Plan Change 1.	Not stated
S28.005	General comments	General comments - overall	Not Stated	The submitter considers the costs of inaction outweigh those of action, and ultimately those costs fall on future generations.	Not stated

S191 Juken New Zealand

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S191.001	General comments	General comments - overall	Not Stated	Concerns about: The extension of controls beyond the recommendations of the Whaitua committee WIP reports. No consideration for ETS implications with the removal of land from production. Inadequate Section 32 analysis Deficient application of NES-CF Regulation 6 for enforcing more stringent rules. Impracticalities of the erosion mapping and definition of high erosion.	
S191.002	General comments	General comments - overall	Not Stated	Supports the submissions of China National Forestry group, John Turkington Ltd and Forest Enterprises Ltd.	
S191.003	General comments	General comments	Not Stated	Notes the NES-PF and NES-CF are part of the government's suite of regulations that help meet the objectives of the NPS-FM. Is unaware of any	

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		- current legislation		evidence that the NES-PF is not meeting the intended outcomes for the Wellington Region and sees no reason why the NES-CF would not continue to do so. Refers to regulation 6 of the NES-CF which allows for a council to provide more stringent rules to meet an objective giving effect to the NPS-FM but notes there is a process to be undertaken by the council to justify any application of stringency, and refers to Section 32 (4) of the RMA. Considers proving a link between a proposed rule and a plan objective that gives effect to the NPS-FM is not sufficient to meet Regulation 6(1)(a). Considers the Section 32 report: Part A - Background and Context (para 88) does not provide any evidence that the enforcing of more stringent rules will deliver better outcomes than the NES-CF. Notes that neither of the two Whaitua committees recommended that the NES - PF was insufficient to meet fresh water targets.	
S191.004	General comments	General comments – plantation forestry	Not Stated	Considers the definition of erosion risk on forestry land in the Erosion Risk Mapping for Te-Awarua-o-Porirua and Te-Whanganui-a-Tara report is flawed, as it does not resemble that erosion risk is significantly lower on land with tree cover than pasture land. Considers there is no logic that defining and removing the top 10% of highest erodible forestry land from production would lead to better outcomes for fresh water, and that no consideration has been given to Emission Trading Scheme (ETS) implications for forestry land that has been categorised in the top 10% of the highest erosion land. Notes that land that can't be replanted will lead to liabilities under the ETS. Notes that replanting is included in the Section 32 report but was an omission in the draft plan as an oversight by the GWRC. Considers this should have	

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				been rectified by updating the draft plan rather than waiting on submissions as submitters maybe unaware of the replanting omission. Concerns that the pixelated quality of maps 92 and 95 will result in more land then necessary written off.	

S100 Julian Bateson

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S100.001	General comments	General comments - overall	Not Stated	Supports the New Zealand Farm Forestry Association Inc, and the Wellington Branch of the New Zealand Farm Forestry Associations' submissions.	Not stated

S208 Julie Martin

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S208.001	General comments	General comments - overall	Oppose	Opposes PC1 in relation to the management of freshwater within Te Whaitua te Whanganui-a-Tara Implementation Programme, the amendments to the beds of lakes and rivers rules, and new sites with significant indigenous biodiversity values. Notes objection to 'new national direction' due to the change of Government and potential for national direction to change making PC1 unfit for purpose. Opposes the content of the Te Whaitua te Whanganui IP as it discusses the submitter's property.	Not Stated

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S208.002	General comments	General comments - consultation	Oppose	Concerned about the timing of consultation on PC1 at a busy and stressful time of the year given its length and complexity. Also concerned about a lack of direct consultation.	Extend public consultation

S257 Kāinga Ora

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S257.001	General comments	General comments - definitions	Amend	Notes provisions and rule framework refer to "greenfield development" but there is no corresponding definition.	Introduce new definition for Greenfield Development.
S257.002	General comments	General comments - overall	Amend	Not stated	That the specific amendments, additions or retentions which are sought, are accepted and adopted into the Natural Resources Plan, including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.003	2 Interpretation	Earthworks	Amend	Generally supports the definition as it aligns with the National Planning Standards. Clarification is sought in the related rules of Chapters 8 and 9 that exclude thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance.	Retain notified definition, subject to rules being amended to enable works associated with infrastructure. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.004	2 Interpretation	Hydrological control	Oppose	Considers the definition is non-specific and not appropriate for use as a permitted standard. Questions who is responsible for determining the PA status, and on what basis.	Amendment sought to provide greater clarity as to what constitutes a hydrological control. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.005	2 Interpretation	Impervious surfaces	Support	Supports proposed wording.	Retain notified definition

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S257.006	2 Interpretation	Redevelopment	Oppose	Opposes the inclusion of reconstruction and replacement within the definition.	Amendments sought Remove "reconstruction" and "replacement" from definition. Alternatively, create an appropriate exclusion for larger areas where no treatment is provided. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.007	2 Interpretation	Stabilisation	Support	Supports proposed wording.	Retain notified definition
S257.008	2 Interpretation	Stormwater treatment system	Support	Supports proposed wording.	Retain notified definition
S257.009	2 Interpretation	Unplanned greenfield development	Oppose	Opposes definition based on areas identified as 'unplanned greenfield area' on maps 86, 87, 88, and 89. Notes the maps do not reflect zoning changes that have been made by the Porirua PDP Hearing Panel. Considers the proposed 'unplanned greenfield areas' comprising open space zoned land in Porirua will inhibit public housing projects, as some existing open space zoned land is intended to be acquired and/ or will be the subject of land swaps. Considers it unclear what constitutes "greenfield development" in the context of "unplanned greenfield development", including whether infrastructure is included, and if so considers it unworkable. Considers the existing rule framework will constrain expansion and/or construction of new infrastructure in locations that benefit from a designation for such public works.	Amendments sought A full review of, and expansion to the areas identified as planned/existing urban areas on maps 86-89. Exclusion of land zoned as open space areas from unplanned greenfield areas where these are located in an urban environment. Include new definition for Greenfield Development. Within this definition, seek also an exclusion of infrastructure works (as infrastructure works often traverses non-urban zones to service the urban environment). Further infrastructure works (including network upgrades) can result in the enhancement and betterment of environmental and water quality outcomes). Delete associated Prohibited Activity rule framework / or reduce activity status to align with the NPS-UD. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.010	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater	Not Stated	Mostly supportive of the proposed objectives but notes that some objectives would be difficult to achieve. Seeks outcomes across PC1 to ensure the Plan Change does not extend beyond that necessary to	Consequential changes sought where relevant to reconcile outcomes to changes sought in specific rules. Amendments to align with and not go beyond what is required under the NPS-FM. Amend to reflect an extended timeline for the achievement of

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.		implement the NPS-FM, noting the considerable additional regulatory burden such a framework imposes upon a range of stakeholders. Considers this appropriate to ensure PC1 does not unnecessarily fetter the ability to deliver development outcomes, noting the national significance of enabling urban development. In terms of timelines for achievement of the Target Attribute States provided within the provisions at WH.O2, WH.O3, Table 8.1 , WH.O8, Table 8.4, and WH.P4, seeks an extended timeframe from the 2040 currently prescribed to a more realistic timeframe to consider the costs and feasibility of achieving the TAS.	TAS which takes into consideration the feasibility and cost of achieving the prescribed timeframes. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.011	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Oppose	Generally supports the intent of this policy, but opposes reference to prohibiting unplanned greenfield development at WH.P2(a). Reasons for this are discussed in submission on the relevant policy and rule framework specific to unplanned greenfield development. Would support an extended timeline for the achievement of meeting the TAS.	Remove reference to prohibiting unplanned greenfield development at WH.P2(a). Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.012	8 Whaitua Te Whanganui-a-Tara	Policy WH.P4: Achievement of the visual clarity target attribute states.	Neutral	Generally supports but would support an extended timeline for the achievement of meeting the TAS.	Amend to reflect an extended timeline for the achievement of TAS which takes into consideration the feasibility and cost of achieving the prescribed timeframes. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.013	8 Whaitua Te	Table 8.5: Sediment	Neutral	Generally supports but would support an extended timeline for the achievement of meeting the TAS.	Amend to reflect an extended timeline for the achievement of TAS which takes into consideration the feasibility and cost of

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	Whanganui-a-Tara	load reductions required to achieve the visual clarity target attribute states.			achieving the prescribed timeframes. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.014	8 Whaitua Te Whanganui-a-Tara	Policy WH.P6: Cumulative adverse effects of point source discharges.	Oppose	Supports the general intent of the policy, but opposes the restrictive avoid policy framework.	Amend to remove the avoidance framework, or alternatively, introduce an appropriate qualifier statement to the avoidance framework. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.015	8 Whaitua Te Whanganui-a-Tara	Policy WH.P8: Avoiding discharges of specific products and waste.	Amend	Supports the proposed policy but only in relation to the untreated state of discharges.	Alter so all points relate to untreated discharges Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.016	8 Whaitua Te Whanganui-a-Tara	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Amend	Generally supports but would support an extended timeline for the achievement of meeting the TAS.	Amend to reflect an extended timeline for the achievement of TAS which takes into consideration the feasibility and cost of achieving the prescribed timeframes. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

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S257.017	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	Support	Broadly supports the policy but considers the proposed rule framework that flows from this requiring the control and treatment of stormwater at site and corresponding thresholds are overly restrictive.	Retain policy as notified
S257.018	8 Whaitua Te Whanganui-a-Tara	Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy.	Amend	Generally supports this policy framework but seeks recognition of, and a pathway for, the development and implementation of catchment/sub-catchment Stormwater Management Plans for other entities outside of local authority and State Highway networks.	Not stated
S257.019	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Oppose	Generally supports provisions that seek to minimise the adverse effects of stormwater discharge on the environment but notes the 85% requirement as proposed by the policy introduces a significant cost to developers of a site. Concerned that this policy reads like a rule, would be difficult to achieve through redevelopment of existing urban environments, and could discourage brownfield redevelopment. Notes the policy is framed as if all impervious surfaces are in fact holding contaminants needing to be treated and considers this is a high and unreasonable test which will be costly to implement. Considers the focus should be more on those areas which contaminant loading is higher (i.e. roads with high vehicle use, large carpark areas, industrial areas).	Amendments sought Review policy drafting to ensure it is more "policy focused". Consequential amendments are sought to reflect changes sought in associated rules Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

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				Seeks amendment to provisions to recognise a pathway for the creation and implementation of Stormwater Management Plans for other entities outside of local authority and State Highway networks.	
S257.020	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Oppose	Opposes the financial contribution framework for greenfield development. Considers the broader provisions and regulatory framework of PC1 significantly onerous, and the further imposition of financial contributions will further limit the supply of affordable housing.	Delete policy and rules associated in regard to the requirement to pay financial contributions; Alternatively, Review financial contributions to enable consideration and account for of network improvements undertaken in the relevant catchment (to which the proposal relates), where such works would enhance existing water quality outcomes. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.021	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Oppose	Opposes this policy and the Prohibited Rule framework and considers policy is too narrow since it does not provide any pathway or guidance other than avoidance and the proposed prohibited activity framework is overly onerous. Acknowledges that discharges from new urban areas generally increase the contaminant load within an undeveloped area but it is too far to automatically conclude that this would impede achievement of the target attribute state. Considers the activity status fails to recognise that greenfield development can provide a range of opportunities to more effectively undertake catchment-based stormwater management and enhance the environment, particularly those that are already in a degraded state. Noting the RMA is an effects-based framework, considers it unclear why new stormwater discharge from unplanned greenfield development is treated differently from stormwater discharge from planned development. Considers the s32 analysis contains inadequate	Delete the policy Alternatively, amend the proposed policy to provide a pathway where the effects from additional stormwater discharges can be managed appropriately. This alternative framework could also incorporate a set of criteria for out of sequence development, which is in line with the direction of the NPS-UD. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

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				justification of this framework and that the proposed framework is at odds with the NPS-UD - which requires responsiveness to urban development.	
S257.022	8 Whaitua Te Whanganui-a-Tara	Policy WH.P17: General wastewater policy to achieve target attribute states and coastal objectives.	Amend	Generally supports but would support an extended timeline for the achievement of meeting the TAS.	Amend to reflect an extended timeline for the achievement of TAS which takes into consideration the feasibility and cost of achieving the prescribed timeframes. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.023	8 Whaitua Te Whanganui-a-Tara	Policy WH.P18: Progressing works to meet Escherichia coli target attribute states.	Amend	Generally supports but would support an extended timeline for the achievement of meeting the TAS.	Amend to reflect an extended timeline for the achievement of TAS which takes into consideration the feasibility and cost of achieving the prescribed timeframes. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.024	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Amend	Generally support this policy but questions if an accompanying technical review has been undertaken of the current GWRC Erosion and Sediment Control Guideline, and whether the practices set out within the document are capable of delivering the TSS standard under PC1. Refers to submission points against WH.P31.	Amendments sought Integrate consideration of winter works Consequential changes Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.025	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Oppose	Questions the 100g/m3 TSS standard for earthworks and what has informed this standard. Notes supporting technical reports refer to a reduction in annual sediment load of 40% per year but do not draw a connection between this target reduction and the proposed standard in PC1.	Review of and explanation of the 100g/m3 TSS standard. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

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S257.026	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose	Opposes this policy and the non-complying rule framework. Considers winter works can be adequately considered as a listed matter of discretion within a RDA rule, with conditions being placed accordingly to manage works during this period. Considers the framework lacks real-world practical application.	Delete the policy and consequential changes to WH.P29 and the related rule framework. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.027	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Amend	Considers it unclear how discharge to soakpits is to be considered within the rule framework (or more generally across PC1). Seeks amendment to WH.R2(b) to clarify the presumed intent of this Permitted Activity rule i.e. that is not intended to capture discharge via soakpits (noting the definition of stormwater network includes soakpits). Notes these could risk elevation to NC activity under P.WH12.	Clarify that soak pits are permitted Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.028	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Oppose	Opposes the current thresholds of this rule. WH.R5(a) - Considers 1,000m² of impervious area is a low baseline for development and will impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis. Considers the focus should be more on those areas where contaminant loading is higher. Considers it unclear whether the 1000m² threshold relates to only new areas of impervious surfaces, or whether the overall total of impervious surfaces of a redeveloped site is limited to 1000m² (regardless of existing state). If the latter, Submitter seeks amendment so the 1000m² threshold relates only to new surfaces totalling more than 1000m². WH.R5(c) - Considers the current standard requiring hydrological control where new impervious surface exceeds 30m² is overly restrictive and unclear as to how to determine compliance. Considers it is unclear how the very low threshold of 30m² has been determined, and the definition of "hydrological	Increase permitted impervious surface threshold above 1000m² to at least no less than 5000m². Clarify that the threshold relates to new/additional areas of impervious surfaces Clarify that external fixings are excluded at WH.R5(b) Delete WH.R5(c). Include permitted pathway for developments where they are operating under a certified sub-catchment Stormwater Management Plan [or similar]. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

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				control" is also unclear. Considers the method of compliance appears to conflict with other water standards managing this issue, noting that Wellington Water's acceptable solutions do not align with the requirement for hydrological control. Notes the conflict with WWL standards, and duplication with emerging District Plan requirements. Amendments sought to account for off-site controls that have been designed to manage catchment run-off from large-scale development works.	
S257.029	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Oppose	Opposes the 1,000m² threshold of impervious area, noting reasons outlined in submission on WH.R5. Seeks an additional measure by which a large-scale proposal can be considered as a Controlled Activity - regardless of compliance with WH.R6 (a) - where the stormwater is to be managed in accordance with a certified catchment/sub-catchment Stormwater Management Plan (or similar). Opposes WH.R6/P.R6(c) as it does not provide alternative framework applicable to catchment based solutions for attenuation, control and treatment associated with "greenfield development", and does not provide for reductions where treatment exceeds 85%.	Increase the 1000m²-3000m² threshold to align with the at least minimum of 5000m² as a permitted activity in WH.R5. Failing implementation of changes sought under WH.R5, provide for proposal to be Controlled activity where it fails to meet WH.R6(a), but is being undertaken in accordance with a certified sub-catchment Stormwater Management Plan [or similar]. Include an exclusion to WH.R6(c) where a proposal is being undertaken as part of a wider comprehensive development that includes a catchment scale stormwater treatment system. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.030	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Oppose	Opposes the starting point of a 1,000m² threshold of impervious area noting reasons outlined in submission on WH.R5. Considers the range (1000m²-3000m²) provided for in this rule is too restrictive and should be increased. Suggests an upper limit of at least 5000m² as permitted. Considers that this rule duplicates emerging regulation and rules introduced in District Plans in the region.	Increase the 1000m²-3000m² threshold commensurate with the minimum 5000m² threshold for permitted activities. Failing implementation of changes sought under P.R5, provide for proposal to be Controlled activity where it fails to meet WH.R7(a), but is being undertaken in accordance with a certified sub-catchment Stormwater Management Plan [or similar]. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S257.031	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Oppose	Opposes threshold at which point this rule applies and seek that this is amended commensurate with the relief sought for permitted activities. Opposes the Discretionary activity status, and instead seek a RDA rule in its place along with relevant matters of discretion (which could include): • [matters outlined in submission on WH.R7] • The contents and implementation of a Stormwater Impact Assessment prepared in accordance with schedule 29, • Implementation of identified measures in a relevant stormwater management plan for a catchment Opposes WH.R11(b) as it does not provide alternative framework applicable to catchment based solutions for attenuation, control and treatment associated with "greenfield development", and doesn't allow for a corresponding reduction in cases where treatment exceeds the 85% requirement.	Reframe as a RD activity status Increase the 3000m² threshold commensurate with the relief sought in WH.R5. Include an exclusion to WH.R11(b) where a proposal is being undertaken as part of a wider comprehensive development that includes a catchment scale stormwater treatment system. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.032	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Amend	Opposes in part WH.R12(d) - and the link to non-compliance with conditions of WH.R11 insofar as it relates to financial contributions and similarly the reference to WH.R13 as a prohibited activity.	Remove reference to compliance with financial contributions as cross referenced in WH.R11. Delete reference to WH.R13 Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.033	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development -	Oppose	Opposes this policy and the Prohibited Rule framework and considers policy is too narrow since it does not provide any pathway or guidance other than avoidance and the proposed prohibited activity framework is overly onerous. Acknowledges that discharges from new urban areas generally increase the contaminant load within an undeveloped area but it is too far to automatically conclude that this would impede	Delete rule. Alternatively, amend activity status and remove consequential requirement for separate Plan Change process, instead incorporating a set of criteria for out of sequence development that is in line with the NPS-UD. Undertake review of, and expansion to the areas identified as planned/existing urban areas on maps 86-89. Any further, alternative or consequential relief as may be

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		prohibited activity.		achievement of the target attribute state. Considers the activity status fails to recognise that greenfield development can provide a range of opportunities to more effectively undertake catchment-based stormwater management and enhance the environment, particularly those that are already in a degraded state. Considers the s32 analysis contains inadequate justification of this framework and that the proposed framework is at odds with the NPS-UD - which requires responsiveness to urban development. Suggest that a set of criteria for out of sequence development is provided in line with the NPS-UD. Concerns around the lack of clarity in relation to how this framework is intended to apply noting the term 'greenfield development' is undefined. Considers it unclear what the full extent of activities are to be included within the scope of 'greenfield development' and would be concerned if this included infrastructure. Disputes the identified "Unplanned Greenfield Development" areas.	necessary to fully achieve the relief sought in this submission.
S257.034	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity.	Amend	Generally supports intent of this rule but seeks a clear threshold for vegetation clearance that can occur as a permitted activity.	Introduce a permitted threshold of vegetation clearance. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.035	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land -	Oppose	Generally supports the intent of this rule but considers the 200m² threshold too onerous. Considers it unclear how 200m² for the clearance of woody vegetation has been arrived at, noting the operative NRP provides for such clearance up to 2ha.	Increase the threshold of vegetation clearance before consent is required as a controlled activity. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		controlled activity.			
S257.036	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Oppose	Broadly supports the intent of this rule (as amended by Clause 16), but oppose WH.R23(c)(iv) as it is not practical or achievable to avoid all discharge from the site.	Delete WH.R23(c)(iv) Include an exclusion within the rule that exempts activities associated with the trenching of services - i.e. thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.037	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Oppose	Questions the 100g/m3 TSS standard for earthworks and seek clarification as to what has informed this standard. Notes the supporting technical reports refer to a reduction in annual sediment load of 40% per year but do not draw a connection between this target reduction and the proposed standard in PC1. Opposes the condition in the rule at WH.R24(b) as it places a restriction on earthworks between 1st of June and 30th September and the resulting escalation to a non-complying activity.	Delete the condition in the rule at WH.R24(b) where it places a restriction on earthworks between 1st of June and 30th September and the resulting escalation to a non-complying activity. Instead, include winter works as a matter of discretion within the relevant RDA rule. Include an exclusion within the rule that exempts activities associated with the trenching of services - i.e. thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.038	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Oppose	Opposes the non-complying rule insofar as it relates to winter works.	Delete WH.R25 with consideration of winter works being a listed matter of discretion under WH.R24. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.039	9 Te Awarua-o-Porirua Whaitua	Objective P.O1: The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural	Amend	Mostly supportive of the proposed objectives but notes that some objectives would be difficult to achieve. Seeks outcomes across PC1 to ensure the Plan Change does not extend beyond that necessary to implement the NPS-FM, noting the considerable additional regulatory burden such a framework imposes upon a range of stakeholders. Considers this appropriate to ensure PC1 does not unnecessarily fetter the ability to deliver	Consequential changes sought where relevant to reconcile outcomes to changes sought in specific rules. Amendments to align with and not go beyond what is required under the NPS-FM. Amend to reflect an extended timeline for the achievement of TAS which takes into consideration the feasibility and cost of achieving the prescribed timeframes. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100.		development outcomes, noting the national significance of enabling urban development. In terms of timelines for achievement of the Target Attribute States provided within the provisions at WH.O2, WH.O3, Table 8.1 , WH.O8, Table 8.4, and WH.P4, seeks an extended timeframe from the 2040 currently prescribed to a more realistic timeframe to consider the costs and feasibility of achieving the TAS.	
S257.040	9 Te Awarua-o-Porirua Whaitua	Policy P.P1: Improvement of aquatic ecosystem health.	Support	Generally support this policy as it focuses on the improvement of ecosystem health, which is consistent with the NPS-FM.	Retain as notified
S257.041	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	Generally support this policy as it focuses on the new attributes aimed specifically at providing for ecosystem health, which is consistent with the NPS-FM; although the related timeline for achievement of the corresponding TAS is sought to be extended, as noted elsewhere. Opposes reference to prohibiting unplanned greenfield development at P.P2(a) for reasons noted in submission against the relevant policy and rule framework specific to unplanned greenfield development.	Remove reference to prohibiting unplanned greenfield development at P.P2(a). Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.042	9 Te Awarua-o-Porirua Whaitua	Policy P.P4: Contaminant load reductions.	Amend	Generally supports but would support an extended timeline for the achievement of meeting the TAS.	Amend to reflect an extended timeline for the achievement of TAS which takes into consideration the feasibility and cost of achieving the prescribed timeframes. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S257.043	9 Te Awarua-o-Porirua Whaitua	Table 9.3: Harbour arm catchment contaminant load reductions.	Amend	Generally supports but would support an extended timeline for the achievement of meeting the TAS.	Amend to reflect an extended timeline for the achievement of TAS which takes into consideration the feasibility and cost of achieving the prescribed timeframes. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.044	9 Te Awarua-o-Porirua Whaitua	Policy P.P8 Avoiding discharges of specific products and waste.	Amend	Generally supports the proposed policy, but seeks amendments so it relates to the untreated state of discharges.	Alter so all points relate to untreated discharges Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.045	9 Te Awarua-o-Porirua Whaitua	Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Support	Supports this general policy which outlines requirement to manage SW discharge in order to achieve the stated TAS in the identified timeframes	Not stated
S257.046	9 Te Awarua-o-Porirua Whaitua	Policy P.P10: Managing adverse effects of stormwater discharges.	Neutral	Broadly supports the policy but considers the proposed rule frameworks that flows from this requiring the control and treatment of stormwater at site and corresponding thresholds are overly restrictive.	Retain as notified
S257.047	9 Te Awarua-	Policy P.P13:	Amend	Generally supports provisions that seek to minimise the adverse effects of stormwater discharge on the	Consequential amendments are sought to reflect changes sought in associated rules.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	Stormwater discharges from new and redeveloped impervious surfaces.		environment but notes the 85% requirement as proposed by the policy introduces a significant cost to developers of a site. Concerned that this policy reads like a rule, would be difficult to achieve through redevelopment of existing urban environments, and could discourage brownfield redevelopment. Seeks amendment to provisions to recognise a pathway for the creation and implementation of Stormwater Management Plans for other entities outside of local authority and State Highway networks.	Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.048	9 Te Awarua-o-Porirua Whaitua	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Oppose	Opposes the financial contribution framework for greenfield development. Considers the broader provisions and regulatory framework of PC1 significantly onerous, and the further imposition of financial contributions will further limit the supply of affordable housing. Notes no definition of greenfield development creates unhelpful ambiguity within the proposed framework.	Delete policy and rules associated in regard to the requirement to pay financial contributions; Alternatively, Review financial contributions to enable consideration and account for of network improvements undertaken in the relevant catchment (to which the proposal relates), where such works would enhance existing water quality outcomes. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.049	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Oppose	Opposes this policy and the Prohibited Rule framework and considers policy is too narrow since it does not provide any pathway or guidance other than avoidance and the proposed prohibited activity framework is overly onerous. Acknowledges that discharges from new urban areas generally increase the contaminant load within an undeveloped area but it is too far to automatically conclude that this would impede achievement of the target attribute state. Considers the activity status fails to recognise that greenfield development can provide a range of opportunities to more effectively undertake catchment-based stormwater management and enhance the environment, particularly those that are already in a	Delete the policy Alternatively, amend the proposed policy to provide a pathway where the effects from additional stormwater discharges can be managed appropriately. This alternative framework could also incorporate a set of criteria for out of sequence development, which is in line with the direction of the NPS-UD. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				degraded state. Noting the RMA is an effects-based framework, considers it unclear why new stormwater discharge from unplanned greenfield development is treated differently from stormwater discharge from planned development. Considers the s32 analysis contains inadequate justification of this framework and that the proposed framework is at odds with the NPS-UD - which requires responsiveness to urban development.	
S257.050	9 Te Awarua-o-Porirua Whaitua	Policy P.P16: General wastewater policy to achieve target attribute states and coastal water objectives.	Amend	Generally supports but would support an extended timeline for the achievement of meeting the TAS.	Amend to reflect an extended timeline for the achievement of TAS which takes into consideration the feasibility and cost of achieving the prescribed timeframes. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.051	9 Te Awarua-o-Porirua Whaitua	Policy P.P17: Progressing works to meet Escherichia coli target attribute states.	Amend	Generally supports but would support an extended timeline for the achievement of meeting the TAS.	Amend to reflect an extended timeline for the achievement of TAS which takes into consideration the feasibility and cost of achieving the prescribed timeframes. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.052	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Amend	Generally support this policy but questions if an accompanying technical review has been undertaken of the current GWRC Erosion and Sediment Control Guideline, and whether the practices set out within the document are capable of	Integrate consideration of winter works Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				delivering the TSS standard under PC1. Refers to submission points against P.P29	
S257.053	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Amend	Questions the 100g/m3 TSS standard for earthworks and what has informed this standard. Notes supporting technical reports refer to a reduction in annual sediment load of 40% per year but do not draw a connection between this target reduction and the proposed standard in PC1.	Not stated
S257.054	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose	Opposes this policy and the non-complying rule framework. Considers winter works can be adequately considered as a listed matter of discretion within a RDA rule, with conditions being placed accordingly to manage works during this period. Considers the framework lacks real-world practical application.	Delete the policy and consequential changes to WH.P29 and the related rule framework. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.055	9 Te Awarua-o-Porirua Whaitua	Rule P.R2: Stormwater to land - permitted activity.	Amend	Considers it unclear how discharge to soakpits is to be considered within the rule framework (or more generally across PC1). Seeks amendment to WH.R2(b) to clarify the presumed intent of this Permitted Activity rule i.e. that is not intended to capture discharge via soakpits (noting the definition of stormwater network includes soakpits). Notes these could risk elevation to NC activity under P.R11.	Clarify rule such that soak pits are permitted. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.056	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Oppose	Opposes the current thresholds of this rule. WH.R5(a) - Considers 1,000m² of impervious area is a low baseline for development and will require impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis. Considers the focus should be more on those areas where contaminant loading is higher. Considers it unclear whether the 1000m² threshold relates to only new areas of impervious surfaces, or whether the overall total of impervious surfaces of a redeveloped site is limited to 1000m² (regardless of	Increase permitted impervious surface threshold above 1000m² to at least 5000m². Clarify that the threshold relates to new/additional areas of impervious surfaces Clarify that external fixings are excluded at P.R5(b). Delete P.R5(c). Include permitted pathway for developments where they are operating under a certified sub-catchment Stormwater Management Plan [or similar]. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				existing state). If the latter, Submitter seeks amendment so the 1000m² threshold relates only to new surfaces totalling more than 1000m². WH.R5(c) - Considers the current standard requiring hydrological control where new impervious surface exceeds 30m² is overly restrictive and unclear as to how to determine compliance. Considers it is unclear how the very low threshold of 30m² has been determined, and the definition of "hydrological control" is also unclear. Considers the method of compliance appears to conflict with other water standards managing this issue, noting that Wellington Water's acceptable solutions do not align with the requirement for hydrological control. Notes the conflict with WWL standards, and duplication with emerging District Plan requirements. Amendments sought to account for off-site controls that have been designed to manage catchment run-off from large-scale development works.	
S257.057	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Oppose	Opposes the 1,000m² threshold of impervious area, noting reasons outlined in submission on P.R5 and P.R6. Seeks an additional measure by which a large-scale proposal can be considered as a Controlled Activity - regardless of compliance with WH.R6 (a) - where the stormwater is to be managed in accordance with a certified catchment/sub-catchment Stormwater Management Plan (or similar). Opposes WH.R6/P.R6(c) as it does not provide alternative framework applicable to catchment based solutions for attenuation, control and treatment associated with "greenfield development", and does not provide for reductions where treatment exceeds 85%.	Increase the 1000m²-3000m² threshold commensurate with the relief sought in P.R5 above seeking a permitted threshold of at least 5000m². Failing implementation of changes sought under P.R5 above, provide for proposal to be Controlled activity where it fails to meet P.R6(a), but is being undertaken in accordance with a certified sub-catchment Stormwater Management Plan [or similar]. Include an exclusion to P.R6(c) where a proposal is being undertaken as part of a wider comprehensive development that includes a catchment scale stormwater treatment system. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.058	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and	Oppose	Opposes the starting point of a 1,000m² threshold of impervious area noting reasons outlined in submission on P.R5. Considers the range (1000m²-3000m²) provided for	Increase the 1000m²-3000m² threshold commensurate to the relief sought in P.R5 seeking a permitted threshold of at least 5000m². Failing implementation of changes sought under P.R5

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		redeveloped impervious surfaces of existing urbanised areas-controlled activity.		in this rule is too restrictive and should be increased. Suggests an upper limit of at least 5000m² as permitted. Considers that this rule duplicates emerging regulation and rules introduced in District Plans in the region.	above, provide for proposal to be Con activity where it fails to meet P.R6(a), but is being undertaken in accordance with a certified sub-catchment Stormwater Management Plan [or similar]. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.059	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Oppose	Opposes threshold at which point this rule applies and seek that this is amended commensurate with the relief sought for permitted activities. Opposes the Discretionary activity status, and instead seek a RDA rule in its place along with relevant matters of discretion (which could include): • [matters outlined in submission on P.R7] • The contents and implementation of a Stormwater Impact Assessment prepared in accordance with schedule 29, • Implementation of identified measures in a relevant stormwater management plan for a catchment Opposes P.R11(b) as it does not provide alternative framework applicable to catchment based solutions for attenuation, control and treatment associated with "greenfield development", and doesn't allow for a corresponding reduction in cases where treatment exceeds the 85% requirement.	Reframe as a RD activity status Increase the 3000m² threshold commensurate with the baseline of at least 5000m² for a permitted activity. Include an exclusion to P.R10(b) where a proposal is being undertaken as part of a wider comprehensive development that includes a catchment scale stormwater treatment system. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.060	9 Te Awarua-o-Porirua Whaitua	Rule P.R11: All other stormwater discharges - non-complying activity.	Oppose	Opposes in part P.R11(d) - and the link to non-compliance with conditions of P.R10 insofar as it relates to financial contributions and similarly the reference to P.R12 as a prohibited activity.	Remove reference to compliance with financial contributions as cross referenced in P.R10. Delete reference to P.R12 Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S257.061	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Oppose	Opposes this policy and the Prohibited Rule framework and considers policy is too narrow since it does not provide any pathway or guidance other than avoidance and the proposed prohibited activity framework is overly onerous. Acknowledges that discharges from new urban areas generally increase the contaminant load within an undeveloped area but it is too far to automatically conclude that this would impede achievement of the target attribute state. Considers the activity status fails to recognise that greenfield development can provide a range of opportunities to more effectively undertake catchment-based stormwater management and enhance the environment, particularly those that are already in a degraded state. Considers the s32 analysis contains inadequate justification of this framework and that the proposed framework is at odds with the NPS-UD - which requires responsiveness to urban development. Suggest that a set of criteria for out of sequence development is provided in line with the NPS-UD. Concerns around the lack of clarity in relation to how this framework is intended to apply noting the term 'greenfield development' is undefined. Considers it unclear what the full extent of activities are to be included within the scope of 'greenfield development' and would be concerned if this included infrastructure. Disputes the identified "Unplanned Greenfield Development" areas.	Delete rule. Alternatively, amend activity status and remove consequential requirement for separate Plan Change process, instead incorporating a set of criteria for out of sequence development that is in line with the NPS-UD. Seek review of and corresponding expansion to identified "Unplanned Greenfield Development" areas. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.062	9 Te Awarua-o-Porirua Whaitua	Rule P.R16: Vegetation clearance on highest erosion risk land-	Amend	Generally supports intent of this rule but seeks a clear threshold for vegetation clearance that can occur as a permitted activity.	Introduce a permitted threshold of vegetation clearance. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
S257.063	9 Te Awarua-o-Porirua Whaitua	Rule P.R17: Vegetation clearance on highest erosion risk land - controlled activity.	Amend	Generally supports the intent of this rule but considers the 200m² threshold too onerous. Considers it unclear how 200m² for the clearance of woody vegetation has been arrived at, noting the operative NRP provides for such clearance up to 2ha.	Increase the threshold of vegetation clearance before consent is required as a controlled activity. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.064	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Oppose	Broadly supports the intent of this rule (as amended by Clause 16), but oppose P.R22(c)(iv) as it is not practical or achievable to avoid all discharges from the site.	Delete P.R22(c)(iv) Include an exclusion within the rule that exempts activities associated with the trenching of services - i.e. thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.065	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Oppose	Questions the 100g/m3 TSS standard for earthworks and seek clarification as to what has informed this standard. Notes the supporting technical reports refer to a reduction in annual sediment load of 40% per year but do not draw a connection between this target reduction and the proposed standard in PC1. Opposes the condition in the rule at P.R23(b) as it places a restriction on earthworks between 1st of June and 30th September and the resulting escalation to a non-complying activity.	Delete the condition in the rule at P.R23(b) where it places a restriction on earthworks between 1st of June and 30th September and the resulting escalation to a non-complying activity. Instead, include winter works as a matter of discretion within the relevant RDA rule. Include an exclusion within the rule that exempts activities associated with the trenching of services - i.e. thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.066	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks - non-complying activity.	Oppose	Opposes the non-complying rule insofar as it relates to winter works.	Delete P.R24 with consideration of winter works being a listed matter of discretion under P.R23. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S257.067	12 Schedules	Schedule 30: Financial Contributions.	Oppose	Opposes the current Financial Contribution policy and rule framework and seeks a consequential review of Schedule 30. Seeks changes to enable consideration of whether a proposal is part of a wider comprehensive development (including those that are progressively staged) that includes a catchment scale stormwater treatment system.	Delete policy and rules associated in regard to the requirement to pay financial contributions; Alternatively, if the relief in 1 is not provided: Review financial contributions to enable consideration and account for network improvements undertaken in the relevant catchment (to which the proposal relates), where such works would enhance existing water quality outcomes. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.068	13 Maps	Map 86: Unplanned greenfield areas - Porirua City Council.	Oppose	Opposes definition based on areas identified as 'unplanned greenfield area' on maps 86, 87, 88, and 89. Notes the maps do not reflect zoning changes that have been made by the Porirua PDP Hearing Panel. Considers the proposed 'unplanned greenfield areas' comprising open space zoned land in Porirua will inhibit public housing projects, as some existing open space zoned land is intended to be acquired and/ or will be the subject of land swaps. Considers it unclear what constitutes "greenfield development" in the context of "unplanned greenfield development", including whether infrastructure is included, and if so considers it unworkable. Considers the existing rule framework will constrain expansion and/or construction of new infrastructure in locations that benefit from a designation for such public works.	Undertake a review of, and expansion to the areas identified as planned/existing urban areas on maps 86-89. Exclude land zoned as open space areas from unplanned greenfield areas, particularly where these are located in an urban environment. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.069	13 Maps	Map 87: Unplanned greenfield areas - Wellington City Council.	Oppose	Opposes definition based on areas identified as 'unplanned greenfield area' on maps 86, 87, 88, and 89. Considers it unclear what constitutes "greenfield development" in the context of "unplanned greenfield development", including whether infrastructure is included, and if so considers it unworkable.	Undertake a review of, and expansion to the areas identified as planned/existing urban areas on maps 86-89. Exclude land zoned as open space areas from unplanned greenfield areas, particularly where these are located in an urban environment. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers the existing rule framework will constrain expansion and/or construction of new infrastructure in locations that benefit from a designation for such public works.	
S257.070	13 Maps	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Oppose	Opposes definition based on areas identified as 'unplanned greenfield area' on maps 86, 87, 88, and 89. Considers it unclear what constitutes "greenfield development" in the context of "unplanned greenfield development", including whether infrastructure is included, and if so considers it unworkable. Considers the existing rule framework will constrain expansion and/or construction of new infrastructure in locations that benefit from a designation for such public works.	Undertake a review of, and expansion to the areas identified as planned/existing urban areas on maps 86-89. Exclude land zoned as open space areas from unplanned greenfield areas, particularly where these are located in an urban environment. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.071	13 Maps	Map 89: Unplanned greenfield areas - Hutt City Council.	Oppose	Opposes definition based on areas identified as 'unplanned greenfield area' on maps 86, 87, 88, and 89. Notes areas on the maps do not include some land that is intended to be developed for urban purposes in the Hutt City jurisdiction, noting this Council is yet to notify its Proposed District Plan. Considers it unclear what constitutes "greenfield development" in the context of "unplanned greenfield development", including whether infrastructure is included, and if so considers it unworkable. Considers the existing rule framework will constrain expansion and/or construction of new infrastructure in locations that benefit from a designation for such public works.	Undertake a review of, and expansion to the areas identified as planned/existing urban areas on maps 86-89. Exclude land zoned as open space areas from unplanned greenfield areas, particularly where these are located in an urban environment. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.072	13 Maps	Map 90: Highest and high erosion risk land (Pasture) -	Neutral	Generally supports the identification of land where it is subject to a proposed planning framework that seeks to manage land-uses upon identified High and Highest Erosion Risk Land, but considers the maps are not readily understood at the site-based level.	Delete maps and provide a definition for 'High and Highest Erosion Risk Land' to more accurately capture such sites which are then subject to the associated rules.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Te Awarua-o-Porirua.		Considers that a definition for 'High and Highest Erosion Risk Land' is more appropriate to capture those areas of land subject to the corresponding rules rather than high level maps.	
S257.073	13 Maps	Map 91: Highest erosion risk land (Woody vegetation) - Te Awarua-o-Porirua.	Neutral	Generally supports the identification of land where it is subject to a proposed planning framework that seeks to manage land-uses upon identified High and Highest Erosion Risk Land, but considers the maps are not readily understood at the site-based level. Considers that a definition for 'High and Highest Erosion Risk Land' is more appropriate to capture those areas of land subject to the corresponding rules rather than high level maps.	Delete maps and provide a definition for 'High and Highest Erosion Risk Land' to more accurately capture such sites which are then subject to the associated rules. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.074	13 Maps	Map 92: Highest erosion risk land (Plantation forestry) - Te Awarua-o-Porirua.	Neutral	Generally supports the identification of land where it is subject to a proposed planning framework that seeks to manage land-uses upon identified High and Highest Erosion Risk Land, but considers the maps are not readily understood at the site-based level. Considers that a definition for 'High and Highest Erosion Risk Land' is more appropriate to capture those areas of land subject to the corresponding rules rather than high level maps.	Delete maps and provide a definition for 'High and Highest Erosion Risk Land' to more accurately capture such sites which are then subject to the associated rules. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.075	13 Maps	Map 93: Highest and high erosion risk land (Pasture) - Te Whanganui-a-Tara.	Neutral	Generally supports the identification of land where it is subject to a proposed planning framework that seeks to manage land-uses upon identified High and Highest Erosion Risk Land, but considers the maps are not readily understood at the site-based level. Considers that a definition for 'High and Highest Erosion Risk Land' is more appropriate to capture those areas of land subject to the corresponding rules rather than high level maps.	Delete maps and provide a definition for 'High and Highest Erosion Risk Land' to more accurately capture such sites which are then subject to the associated rules. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
S257.076	13 Maps	Map 94: Highest erosion risk land	Neutral	Generally supports the identification of land where it is subject to a proposed planning framework that seeks to manage land-uses upon identified High and Highest Erosion Risk Land, but considers the	Delete maps and provide a definition for 'High and Highest Erosion Risk Land' to more accurately capture such sites which are then subject to the associated rules. Any further, alternative or consequential relief as may be

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		(Woody vegetation clearance) - Te Whanganui-a-Tara.		maps are not readily understood at the site-based level. Considers that a definition for 'High and Highest Erosion Risk Land' is more appropriate to capture those areas of land subject to the corresponding rules rather than high level maps.	necessary to fully achieve the relief sought in this submission.
S257.077	13 Maps	Map 95: Highest erosion risk land (Plantation forestry) - Te Whanganui-a-Tara.	Neutral	Generally supports the identification of land where it is subject to a proposed planning framework that seeks to manage land-uses upon identified High and Highest Erosion Risk Land, but considers the maps are not readily understood at the site-based level. Considers that a definition for 'High and Highest Erosion Risk Land' is more appropriate to capture those areas of land subject to the corresponding rules rather than high level maps.	Delete maps and provide a definition for 'High and Highest Erosion Risk Land' to more accurately capture such sites which are then subject to the associated rules. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

S232 Karen Pearce

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S232.001	3 Objectives	3.6 Water quality	Oppose	Considers the plan change should not be actioned because of the change in government.	Progress with the plan change should be stopped.

S205 Kelly Few-Mackay & Lewis Few-Mackay

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S205.001	General comments	General comments - consultation	Oppose	Concerned there was no consultation with affected parties. Considers properties of 4-20 ha should have been contacted directly.	Withdraw PC1 and undertake effective consultation.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S205.002	General comments	General comments - water quality improvements	Not Stated	Considers data is insufficient to identify origination of contamination and PC1 requires registered farms to collect the data for GWRC and at no cost to them. Considers readings in Upper Hutt reaches are excellent and fed by the rural rivers. Establishing contamination present in the lower reaches is not originating from the farming communities of Akatarawa and Mangaroa. Concerned GWRC is trying to solve a problem that does not exist.	Amend: Focus on urban source issues rather than contamination problems from farming.
S205.003	General comments	General comments - definitions	Amend	Notes there are a number of references to small rivers, less than 1 metre wide but concerned there is a open-definition for the minimum small river size.	Amend: Clarify definitions which influence other regulations.
S205.004	General comments	General comments - rural	Not Stated	Considers the section 32 report establishes that none of the measures aimed at the Mangaroa Valley and Akatarawa Valley farming community in section 6.9 are justified. Considers the proposed measures will achieve little at an unquantified cost.	Withdraw all measures targeted at the Upper Hutt farming/lifestyle block community.
S205.005	6 Other methods	Method M42: Small farm property registration within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Not Stated	Concerned the registration process requires landowners to provide complex data such as average stocking rates, calculating effective grazing areas, map property boundaries and showing waterbodies where stock exclusion fencing is required under new rules. Considers whilst it seems to be a simple task, it assumes all landowners have the information readily available.	Amend: Adopt suitable systems and support to collate and assist the information required.
S205.006	8 Whaitua Te	Policy WH.P23: Achieving	Not Stated	Concerned there is no data to suggest sediment is coming from farming activities and no data has been collected to understand the activities on	Defer PC1 until relevant data is collected.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	reductions in sediment discharges from farming activities on land with high risk of erosion.		lifestyle blocks. Concerned GWRC is making assumptions that all sediment is the result of human activity. Considers strong probability that human activity can contribute to the sediment load but important to consider proportion arises from natural erosion processes. Considers GWRC must take into account all factors within the catchments.	
S205.007	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Not Stated	Notes the definition of livestock only references cattle, farmed deer and farmed pigs. Considers any other stock are exempt from all rules.	Amend: Confirm the rules are exclusive to these animals.

S103 Kim Bowen

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S103.001	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Amend	Concerned with the single monitoring site in the Makara river. Considers this does not give accurate idea of where the sediment or contaminants would be originating from. Considers GWRC should increase number of monitoring sites to identify where water quality improvements could be made.	Increase the water monitoring sites
S103.002	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment	Oppose	Considers that local communities know how to look after their land areas the best. Disagrees with the regulatory approach for the proposed plan change taken by GWRC. Concerned with large costs associated with fencing.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discharges from farming activities on land with high risk of erosion.		Concerned that guardianship rights of the land will be lost.	
S103.003	2 Interpretation	Whaitua	Oppose	Concerned with the consultation process. Considers GWRC is not interested in genuine feedback and consultation from the affected community. Concerned the plan change will have a significant impact on farms in Makara and considers there has been minimal effort to notify the affected property owners.	Considers an improved consultation process with the community is required.

S281 Kirsty Gill

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S281.001	General comments	General comments - overall	Oppose	Concerned PC1 puts excessive restrictions on land owners.	Not Stated.
S281.002	General comments	General comments - consultation	Oppose	Considers the community has received insufficient information about the plan. Considers that meetings and deadlines to lodge a submission have been unfair and difficult to meet.	Not Stated.
S281.003	General comments	General comments - water quality improvements	Oppose	Opposes stock exclusion from waterways.	Not Stated.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S281.004	General comments	General comments - rural	Oppose	Concerned the GWRC has erroneously identified land as "erosion prone". Considers it unacceptable for GWRC to require landowners to retire land without compensation.	Not Stated.
S281.005	General comments	General comments - earthworks	Oppose	Considers earthwork provisions are complicated and farmers/land owners will not know how to meet requirements. Concerned stock welfare, farm safety and farm tracks access have been disregarded in new provisions.	Not Stated.
S281.006	General comments	General comments - overall	Oppose	Opposes the broad-brush regulatory approach taken under PC1 and the removal of local decision making from the community. Agrees with the need to improve water quality where it is poor and where solutions are within landowners control. Considers fundamental evidence is required to do this effectively and equitably. Suggests GWRC recognise the personal work done by landowners and partner with the community rather than regulate against them. Notes they will be providing an additional submission in February.	Not Stated.

S279 KiwiRail Holdings Limited

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S279.001	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Support	Notes rule could be applicable to KiwiRail sites and supports the intent of the provision.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S279.002	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Support	Notes rule could be applicable to KiwiRail sites and supports the intent of the provision.	Retain as notified
S279.003	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Support	Notes rule could be applicable to KiwiRail sites and supports the intent of the provision.	Retain as notified
S279.004	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Support	Notes rule could be applicable to KiwiRail sites and supports the intent of the provision.	Retain as notified
S279.005	8 Whaitua Te	Rule WH.R7: Stormwate	Support	Notes rule could be applicable to KiwiRail sites and supports the intent of the provision.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	r from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.			
S279.006	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Support	Notes rule could be applicable to KiwiRail sites and supports the intent of the provision.	Retain as notified
S279.007	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Support	Notes rule could be applicable to KiwiRail sites and supports the intent of the provision.	Retain as notified
S279.008	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land -	Support	Supports the intent of the provision.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		controlled activity.			
S279.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance - discretionary activity.	Support	Supports the intent of the provision.	Retain as notified
S279.010	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Support	Supports the intent of the provision.	Retain as notified
S279.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Support	Supports the intent of the provision.	Retain as notified
S279.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Support	Supports the intent of the provision.	Retain as notified
S279.013	9 Te Awarua-o-Porirua Whaitua	Rule P.R2: Stormwater to land - permitted activity.	Support	Notes rule could be applicable to KiwiRail sites and supports the intent of the provision.	Retain as notified
S279.014	9 Te Awarua-o-Porirua Whaitua	Rule P.R3: Stormwater from an existing individual	Support	Notes rule could be applicable to KiwiRail sites and supports the intent of the provision.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		property to surface water or coastal water - permitted activity.			
S279.015	9 Te Awarua-o-Porirua Whaitua	Rule P.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Support	Notes rule could be applicable to KiwiRail sites and supports the intent of the provision.	Retain as notified
S279.016	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Support	Notes rule could be applicable to KiwiRail sites and supports the intent of the provision.	Retain as notified
S279.017	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas-	Support	Notes rule could be applicable to KiwiRail sites and supports the intent of the provision.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		controlled activity.			
S279.018	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Support	Notes rule could be applicable to KiwiRail sites and supports the intent of the provision.	Retain as notified
S279.019	9 Te Awarua-o-Porirua Whaitua	Rule P.R11: All other stormwater discharges - non-complying activity.	Support	Notes rule could be applicable to KiwiRail sites and supports the intent of the provision.	Retain as notified
S279.020	9 Te Awarua-o-Porirua Whaitua	Rule P.R16: Vegetation clearance on highest erosion risk land-permitted activity.	Support	Supports the intent of the provision.	Retain as notified
S279.021	9 Te Awarua-o-Porirua Whaitua	Rule P.R17: Vegetation clearance on highest erosion risk land -	Support	Supports the intent of the provision.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		controlled activity.			
S279.022	9 Te Awarua-o-Porirua Whaitua	Rule P.R18: Vegetation clearance - discretionary activity.	Support	Supports the intent of the provision.	Retain as notified
S279.023	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Support	Supports the intent of the provision.	Retain as notified
S279.024	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Support	Supports the intent of the provision.	Retain as notified
S279.025	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks - non-complying activity.	Support	Supports the intent of the provision.	Retain as notified

S106 Korokoro Environment Group

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S106.001	8 Whaitua Te	Table 8.4: Target attribute	Support	Lack of baseline data for Korokoro Stream but considers the high Target Attributes for Korokoro Stream are appropriate. Supports the inclusion of	Retain as notified (inferred)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	states for rivers.		monitoring of Korokoro Stream and the tributary in Galbraith's Gully and seeks to be involved with community participation and information sharing.	
S106.002	8 Whaitua Te Whanganui-a-Tara	C. Freshwater Action Plans in Whaitua Te Whanganui-a-Tara	Amend	Freshwater action plan requirements should include attributes for fine sediment due to activities in the catchment including potential road building, and forestry, and fish given the significance of the habitat in Korokoro Stream which is identified in Schedules F1, F2c and F4.	Supports the requirement for a Freshwater Action Plan for Korokoro Stream but would like to see fine sediment and fish added to the attributes for which the Freshwater Action Plan is prepared.
S106.003	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Support	Supports stream health being maintained and improved. Notes potential for unknown cross-contamination (sewer-stormwater). Seeks to be involved in supporting and communicating any wastewater catchment strategies required for Korokoro Stream	Retain strategic action (m) as notified (inferred)

S169 KORU HOMES NZ LIMITED

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S169.001	2 Interpretation	Hydrological control	Amend	Definition does not assist provision interpretation as it does not outline what these controls are. Notes that the definition of 'stormwater treatment system' has some examples and specifications in Schedule 28.	**Amend definition to outline what hydrological controls are, including examples and a schedule with technical standards.**
S169.002	2 Interpretation	Impervious surfaces	Amend	A roof with rainwater collection should be excluded from impervious surfaces definition if it complies with hydraulic neutrality rules in District Plans. Implementing greywater reuse increases costs and is not a requirement of any regulation including PC1 or the NRP.	**Amend definition as follows and make any other consequential relief necessary to give effect to this submission point:** **Surfaces that prevent or significantly impede the infiltration of stormwater into soil or the ground, includes: roofs, paved areas (including sealed/compacted metal) such as roads, driveways,**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					parking areas, sidewalks/foot paths or patios, and excludes: grassed areas, gardens and other vegetated areas, porous or permeable paving, slatted decks which allow water to drain through to a permeable surface, porous or permeable paving and living roofs, roof areas with rainwater collection ~~and reuse, any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)~~
S169.003	2 Interpretation	Redevelopment	Amend	Definition should exclude extension to existing buildings to provide a baseline for small redevelopment of existing sites as a permitted activity in associated rules.	**Amend definition as follows and make any other consequential relief necessary to give effect to this submission point:** **For the purpose of assessment of a proposal involving the redevelopment of an existing urbanised property (i.e including brownfield development upgrades to existing roads etc.) in relation to stormwater effects. this includes the replacement, reconstruction or addition (new) of impervious surfaces. Excludes: minor maintenance or repairs to roads, carparking areas, driveways and paving, installation, maintenance or repair of underground infrastructure or network utilities requiring trenching and resurfacing, activities that only involve the re-roofing of existing buildings,** extensions to existing buildings
S169.004	2 Interpretation	Unplanned greenfield development	Oppose	The definition relates to associated prohibited activity rules that are opposed.	**Delete definition**
S169.005	General comments	General comments - unplanned greenfield development	Oppose	Opposes policy and rules relating to unplanned greenfield growth as the prohibited activity status provides no consenting pathway for proposals that may have positive outcomes. Notes the s32 evaluation states all contaminants can be mitigated through treatment or financial contributions and on this basis the prohibited activity status is inappropriate for effects management.	**Amend policy as follows and make any other consequential relief necessary to give effect to this submission point:** **Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (a) ~~prohibiting~~**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Concerned that activity status is also inconsistent with Policy 8 of the NPS-UD. Concerned the costs and impact on economic viability associated with requiring two plan changes to enable greenfield development and has concerns on how the market would respond.	~~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 (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers, and (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.
S169.006	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	Opposes policy and rules relating to unplanned greenfield growth as the prohibited activity status provides no consenting pathway for proposals that may have positive outcomes. Notes the s32 evaluation states all contaminants can be mitigated through treatment or financial contributions and on this basis the prohibited activity status is inappropriate for effects management. Concerned that activity status is also inconsistent with Policy 8 of the NPS-UD. Concerned the costs and impact on economic viability associated with requiring two plan changes to enable greenfield development and has concerns on how the market would respond.	**Amend policy as follows and make any other consequential relief necessary to give effect to this submission point:** **Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (a) ~~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 (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					and stormwater discharges to rivers, and (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.
S169.007	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	Amend	Concerns PC1 lacks detail on what types of hydrological controls and water sensitive design are required for development. Concerned the conditions in subsections (a)-(c) may burden property owners and developers and the focus in standard (c) on communal stormwater treatment systems may not be practical or achievable. Considers engineering advice should not be a requirement for the design of site specific controls for the creation of small areas of impervious surface. Concerns the s32 evaluation doesn't adequately assess the implication costs of PC1 and its impacts on urban growth and housing supply.	**Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions.** **Delete reference to financial contributions.**
S169.008	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new	Oppose	Opposes financial contributions framework in Schedule 30. Considers imposing financial contributions is a burden that may hinder greenfield development growth impacting housing availability, housing supply costs and housing affordability. concerned that PC1 does not assess the costs to land owners/developers or the consequences for housing supply/affordability. Notes that financial	**Delete Policy WH.P15**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		greenfield developm ent.		contributions dictate the viability of developments for the private sector. Notes the importance of the private sector to provide housing supply and how financial contributions dictate commercial viability of developments. Concerned the flat financial contribution fee would incentivise large lot developments rather than intensification. Considers the acknowledgement that stormwater contaminant treatment is only practicable for a portion of the contaminant load demonstrates the limitations of the proposed solution. Believes the policy heavily relies on financial contributions without consideration for alternatives or new developments that improve water quality. Concerns the use of financial contributions to offset stormwater contamination is not equitable or efficient. Considers Policy WH.P15 and P.P13 anticipate a potential deterioration in water quality and this should prompt exploration of solutions rather than relying on financial contributions. Concerned the feasibility, effectiveness and timing of catchment-scale stormwater treatment systems referenced in Schedule 30 is unclear Opposes GWRC's requirement for financial contributions even if a development could achieve an 85% reduction or more. Believes there is no effects-based reason for the charging of the proposed contribution.	
S169.009	8 Whaitua Te Whangan ui-a-Tara	Policy WH.P16: Stormwate r discharges from new	Oppose	Opposes the avoidance/prohibited approach to greenfield development as the prohibited activity status provides no consenting pathway for proposals that may have positive outcomes.	**Delete Policy WH.P16**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		unplanned greenfield developm ent.		Considers the consent status is inconsistent with the NPS-UD.	
S169.010	8 Whaitua Te Whangan ui-a-Tara	Policy WH.P31: Winter shut down of earthwork s.	Oppose	Opposes requirement for a non-complying resource consent to undertake winter earthworks. Considers large rain events at any time cause larger pulses of sediment than discharges of sediment over the winter period and the current practice for managing winter earthworks with GWRC oversight is sufficient. Considers this existing practice should be retained where it is managed through a separate approvals process against established GWRC criteria. Considers the non-complying activity status doesn't consider scale, nature or duration of the works or specific site conditions. Concerned that stabilising earthworks before the shutdown period may not always be feasible and may result in other perverse environmental outcomes. Considers blanket restrictions are not the most effective approach to address diverse challenges on different sites and areas Considers that where applicants demonstrate that winter works can be managed, this should be supported to avoid unnecessary delay of housing supply	**Delete Policy WH.P31**
S169.011	8 Whaitua Te Whangan ui-a-Tara	Rule WH.R2: Stormwate r to land - permitted activity.	Amend	Concerned the rule requires regional resource consent despite territorial authorities controlling new discharge connections to the network.	**Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:** **Rule WH.R2: Stormwater to land - permitted activity** **The discharge of stormwater onto or into land, including where contaminants may enter groundwater: (a) that is not from a high risk industrial or trade premise, or (b)** that is not connected to **~~that does not discharge from, or~~**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					~~to,~~ a local authority stormwater network, is a permitted activity provided the following conditions are met: (...)
S169.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Amend	Concerned the rule requires regional resource consent despite territorial authorities controlling new discharge connections to the network.	**Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:** **Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity** **The discharge of stormwater from an existing individual property into water, or onto or into land where it may enter a surface water body or coastal water, (a) that is not from a high risk industrial or trade premise, or (b) that is not from a port, airport or state highway, or (c)** that is not connected to **~~does not discharge from, or to,~~ a local authority stormwater network, is a permitted activity, provided the following conditions are met: (...)**
S169.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Concerned there is insufficient detail on what types of hydrological controls and water sensitive design are required for development. Considers the conditions will pose a significant burden on property owners/developers requiring impervious surface treatment and a reduction in contaminants through building materials Considers engineering advice should not be a requirement for the design of site specific controls for the creation of small areas of impervious surface. Concerned the s32 evaluation doesn't adequately assess the implication costs of PC1 and its impacts on urban growth to support population growth and economic development.	**Review policy and rule framework for the treatment of stormwater and provide technical standards for acceptable solutions.** **Delete reference to financial contributions.**
S169.014	8 Whaitua Te	Rule WH.R6:	Amend	Concerned there is insufficient detail on what types of hydrological controls and water sensitive design	**Review policy and rule framework for the treatment of stormwater and provide technical standards for**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	Stormwater from new greenfield impervious surfaces - controlled activity.		are required for development. Considers the conditions will pose a significant burden on property owners/developers requiring impervious surface treatment and a reduction in contaminants through building materials Considers engineering advice should not be a requirement for the design of site specific controls for the creation of small areas of impervious surface. Concerned the s32 evaluation doesn't adequately assess the implication costs of PC1 and its impacts on urban growth to support population growth and economic development.	**acceptable solutions.** **Delete reference to financial contributions.**
S169.015	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Amend	Concerned there is insufficient detail on what types of hydrological controls and water sensitive design are required for development. Considers the conditions will pose a significant burden on property owners/developers requiring impervious surface treatment and a reduction in contaminants through building materials Considers engineering advice should not be a requirement for the design of site specific controls for the creation of small areas of impervious surface. Concerned the s32 evaluation doesn't adequately assess the implication costs of PC1 and its impacts on urban growth to support population growth and economic development.	
S169.016	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new	Amend	Opposes financial contributions to (post- treatment) residual stormwater contaminants. Concerned there is no acknowledgement or recognition that greenfield developments may improve contaminant	**Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and redeveloped impervious surfaces - discretionary activity.		discharges. Opposes the financial contribution as it disproportionately burdens developers and may hinder housing and urban growth, further exacerbating the commercial viability of affordable housing supply. Believes GWRC should promote responsible development without stifling economic and housing progress.	**Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity** **The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or Rule WH.R7, or prohibited under WH.R13 is a discretionary activity provided the following conditions are met: (a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), ~~and (b) if the proposal is for greenfield development a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions).~~**
S169.017	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Amend	Opposes the avoidance/prohibited approach to greenfield development as the prohibited activity status provides no consenting pathway for proposals that may have positive outcomes. Considers the activity status is inconsistent with the NPS-UD.	**Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:** **Rule WH.R12: All other stormwater discharges - non-complying activity** **The:** **(a) discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule WH.R2, or (b) discharge of stormwater into water or onto or into land where it may enter a surface water body or coastal water, that is not permitted by Rule WH.R3, or a restricted discretionary activity under Rules WH.R8 or WH.R9, or (c) discharge of stormwater from a high risk industrial or trade**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					premise that is not permitted by Rule WH.R4, or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade premise that does not meet the conditions of Rule WH.R11, or (d) use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater into water or onto or into land where it may enter water, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or WH.R7, or a discretionary activity under Rule WH.R10 or WH.R11, ~~or a prohibited activity under WH.R13,~~ is a non-complying activity.
S169.018	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Opposes the avoidance/prohibited approach to greenfield development as the prohibited activity status provides no consenting pathway for proposals that may have positive outcomes. Considers the activity status is inconsistent with the NPS-UD	**Delete Rule WH.R13**
S169.019	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	Concerned the 'and' after clause b means that any earthworks that are not on a farm now require consent which is unlikely the intent of the rule.	**Amend rule: Rule WH.R23: Earthworks - permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, ~~and~~** or **(c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).
S169.020	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	Opposes requirement for a non-complying resource consent to undertake winter works. Considers large rain events at any time cause larger pulses of sediment than discharges of sediment over the winter period and the current practice for managing winter earthworks with GWRC oversight is sufficient Concerned the blanket non-complying activity status does not consider the scale, nature or duration of the work.	**Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:** **Rule WH.R24: Earthworks - restricted discretionary activity** **Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					(rivers/lakes), or (ii) 30% in any other river, and ~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~
S169.021	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	Opposes policy and rules relating to unplanned greenfield growth as the prohibited activity status provides no consenting pathway for proposals that may have positive outcomes. Notes the s32 evaluation states all contaminants can be mitigated through treatment or financial contributions and on this basis the prohibited activity status is inappropriate for effects management. Concerned that activity status is also inconsistent with Policy 8 of the NPS-UD. Concerned the costs and impact on economic viability associated with requiring two plan changes to enable greenfield development and has concerns on how the market would respond.	**Amend policy as follows and make any other consequential relief necessary to give effect to this submission point:** **Policy P.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (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 (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers, and (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.**
S169.022	9 Te Awarua-o-Porirua Whaitua	Policy P.P10: Managing adverse effects of	Amend	Concerned PC1 provides insufficient detail about what types of hydrological controls and water sensitive design are required for development. Considers the conditions will pose a significant	**Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions.** **Delete reference to financial contributions.**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		stormwater discharges.		burden on property owners/developers requiring impervious surface treatment and a reduction in contaminants through building materials. Considers engineering advice should not be a requirement for the design of site specific controls for the creation of small areas of impervious surface.	
S169.023	9 Te Awarua-o-Porirua Whaitua	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Oppose	Opposes financial contributions to (post- treatment) residual stormwater contaminants. Concerned there is no acknowledgement or recognition that greenfield developments may improve contaminant discharges. Opposes the financial contribution as it disproportionately burdens developers and may hinder housing and urban growth, further exacerbating the commercial viability of affordable housing supply. Considers GWRC should promote responsible development without stifling economic and housing progress.	**Delete Policy P.P14**
S169.024	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Oppose	Opposes the avoidance/prohibited approach to greenfield development as the prohibited activity status provides no consenting pathway for proposals that may have positive outcomes. Considers the activity status is inconsistent with the NPS-UD.	**Delete Policy P.P15**
S169.025	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of	Oppose	Opposes requirement for a non-complying resource consent to undertake winter earthworks. Considers large rain events at any time cause larger pulses of sediment than discharges of sediment	**Delete Policy P.P29**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		earthworks.		over the winter period and the current practice for managing winter earthworks with GWRC oversight is sufficient. Considers this existing practice should be retained where it is managed through a separate approvals process against established GWRC criteria Considers the non-complying activity status doesn't consider scale, nature or duration of the works or specific site conditions.	
S169.026	9 Te Awarua-o-Porirua Whaitua	Rule P.R2: Stormwater to land - permitted activity.	Amend	Concerned the rule requires regional resource consent despite territorial authorities controlling new discharge connections to the network.	**Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:** **Rule P.R2: Stormwater to land - permitted activity** **The discharge of stormwater onto or into land, including where contaminants may enter groundwater (a) that is not from a high risk industrial or trade premise, or (b)** that is not connected to ~~**that does not discharge from, or to,**~~ **a local authority stormwater network is a permitted activity provided the following conditions are met: (...)**
S169.027	9 Te Awarua-o-Porirua Whaitua	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Amend	Concerned the rule requires regional resource consent despite territorial authorities controlling new discharge connections to the network.	**Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:** **Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity** **The discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, from an existing individual property (a) that is not from a high risk industrial or trade premise, or (b) that is not from a state highway, or (c)** that is not connected to ~~**that does not discharge from, or to,**~~ **a local authority stormwater network is a permitted activity provided the following conditions are met: (...)**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S169.028	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Concerned there is insufficient detail on what types of hydrological controls and water sensitive design are required for development. Considers the conditions will pose a significant burden on property owners/developers requiring impervious surface treatment and a reduction in contaminants through building materials Considers engineering advice should not be a requirement for the design of site specific controls for the creation of small areas of impervious surface. Concerned the s32 evaluation doesn't adequately assess the implication costs of PC1 and its impacts on urban growth to support population growth and economic development.	**Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions.** **Delete reference to financial contributions.**
S169.029	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Concerns PC1 lacks detail on hydrological controls and water sensitive design requirements for development. Concerned the conditions outlined, pose significant burdens on owners/developers requiring impervious surface treatment whilst also reducing contaminants through building materials.	**Review policy and rule framework for the treatment of stormwater and provide technical standards for acceptable solutions.** **Delete reference to financial contributions.**
S169.030	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas-	Amend	Concerned there is insufficient detail on what types of hydrological controls and water sensitive design are required for development. Considers the conditions will pose a significant burden on property owners/developers requiring impervious surface treatment and a reduction in contaminants through building materials Considers engineering advice should not be a requirement for the design of site specific controls for the creation of small areas of impervious	**Review policy and rule framework for the treatment of stormwater and provide technical standards for acceptable solutions.** **Delete reference to financial contributions.**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		controlled activity.		surface. Concerned the s32 evaluation doesn't adequately assess the implication costs of PC1 and its impacts on urban growth to support population growth and economic development.	
S169.031	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Amend	Opposes financial contributions to (post- treatment) residual stormwater contaminants. Concerned there is no acknowledgement or recognition that greenfield developments may improve contaminant discharges. Opposes the financial contribution as it disproportionately burdens developers and may hinder housing and urban growth, further exacerbating the commercial viability of affordable housing supply. Considers GWRC should promote responsible development without stifling economic and housing progress.	**Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:** **Rule P.R10: Stormwater from new and redeveloped impervious surfaces - discretionary activity** **The use of land for the creation of new or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including via an existing local authority stormwater network, that is not permitted by Rule P.R5, or a controlled activity under Rule P.R6 or Rule P.R7, or prohibited under P.R12 is a discretionary activity provided the following conditions are met: (a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), and ~~(b) if the proposal is for greenfield development, a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions).~~**
S169.032	9 Te Awarua-o-Porirua Whaitua	Rule P.R11: All other stormwater discharges	Amend	Opposes the avoidance/prohibited approach to greenfield development as the prohibited activity status provides no consenting pathway for proposals that may have positive outcomes.	**Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:** **Rule P.R11: All other stormwater discharges - non-complying activity**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		- non-complying activity.		Considers the activity status is inconsistent with the NPS-UD.	**The:** **(a) discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule P.R2, or (b) discharge of stormwater into water or onto or into land where it may enter water, that is not permitted by Rule P.R3, or a restricted discretionary activity under Rule P.R8, or (c) discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule P.R4, or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade premise that does not meet the conditions of Rule P.R10, or (d) use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater water or onto or into land where it may enter water, that is not permitted by Rule P.R5, or a controlled activity under Rules P.R6 or P.R7, or a discretionary activity under Rule P.R9, ~~or a prohibited activity under Rule P.R12,~~ is a non-complying activity.**
S169.033	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Oppose	Opposes the avoidance/prohibited approach to greenfield development as the prohibited activity status provides no consenting pathway for proposals that may have positive outcomes. Considers the activity status is inconsistent with the NPS-UD.	**Delete Rule P.R12**
S169.034	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks -	Amend	Concerned the 'and' after clause b means that any earthworks that are not on a farm now require consent which is unlikely the intent of the rule.	**No change required**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
S169.035	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Amend	Opposes requirement for a non-complying resource consent to undertake winter earthworks. Considers large rain events at any time cause larger pulses of sediment than discharges of sediment over the winter period and the current practice for managing winter earthworks with GWRC oversight is sufficient. Considers this existing practice should be retained where it is managed through a separate approvals process against established GWRC criteria Considers the non-complying activity status doesn't consider scale, nature or duration of the works or specific site conditions. Concerned that stabilising earthworks before the shutdown period may not always be feasible and may result in other perverse environmental outcomes. Considers blanket restrictions are not the most effective approach to address diverse challenges on different sites and areas Considers that where applicants demonstrate that winter works can be managed, this should be supported to avoid unnecessary delay of housing supply	**Amend Rule P.R23 to remove condition b: ~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~**
S169.036	12 Schedules	Schedule 30: Financial Contributions.	Oppose	Opposes financial contributions framework in Schedule 30. Recognises importance of addressing stormwater contamination but believes imposing financial contributions is a burden that may hinder greenfield development growth impacting housing availability, housing supply costs and housing affordability. Acknowledgment that stormwater contaminant treatment is only practicable for a portion of the contaminant load further underscores the limitations of the proposed solution	**Delete Schedule 30.**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Believes the policy heavily relies on financial contributions without consideration for alternatives or new developments that improve water quality. Concerns the use of financial contributions to offset stormwater contaminations is not equitable or efficient. Policy WH.P15 and P.P13 outline the anticipation of potential deterioration in water quality which should prompt exploration of solutions rather than relying on financial contributions. Schedule 30 outlines collected funds for catchment-scale stormwater treatment systems, but feasibility, effectiveness and timing of such systems remain unclear. Opposes GWRC's requirement for financial contributions even if a development could achieve an 85% reduction or more. Believes there is no effects-based reason for the charging of the proposed contribution.	
S169.037	13 Maps	Map 86: Unplanned greenfield areas - Porirua City Council.	Oppose	Opposes the avoidance/prohibited approach to greenfield development as the prohibited activity status provides no consenting pathway for proposals that may have positive outcomes. The status is also inconsistent with the NPS-UD.	**Delete map**
S169.038	13 Maps	Map 87: Unplanned greenfield areas - Wellington City Council.	Oppose	Opposes the avoidance/prohibited approach to greenfield development as the prohibited activity status provides no consenting pathway for proposals that may have positive outcomes. Considers the activity status is inconsistent with the NPS-UD.	**Delete map**
S169.039	13 Maps	Map 88: Unplanned greenfield areas -	Oppose	Opposes the avoidance/prohibited approach to greenfield development as the prohibited activity status provides no consenting pathway for proposals that may have positive outcomes.	**Delete map**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Upper Hutt City Council.		Considers the activity status is inconsistent with the NPS-UD.	
S169.040	13 Maps	Map 89: Unplanned greenfield areas - Hutt City Council.	Oppose	Opposes the avoidance/prohibited approach to greenfield development as the prohibited activity status provides no consenting pathway for proposals that may have positive outcomes. Considers the activity status is inconsistent with the NPS-UD.	**Delete map**
S169.041	General comments	General comments - overall	Oppose	Opposes the entirety of PC1	**Withdrawal of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks); OR 2. Should the relief sought in point 1) not occur, the Submitter seeks the relief set out in submission; AND 3. Any other relief (including consequential relief) to give effect to the decisions sought in submission;**
S169.042	General comments	General comments - definitions	Oppose	Opposes amendments to definitions	**Withdrawal of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks); OR 2. Should the relief sought in point 1) not occur, the Submitter seeks the relief set out in submission; AND 3. Any other relief (including consequential relief) to give effect to the decisions sought in submission;**
S169.043	General comments	General comments - overall	Oppose	Opposes amendments to Chapters 5.2 and 5.3	**Withdrawal of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks); OR 2. Should the relief sought in point 1) not occur, the Submitter seeks the relief set out in submission; AND**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					3. Any other relief (including consequential relief) to give effect to the decisions sought in submission;
S169.044	General comments	General comments - overall	Oppose	Opposes Chapter 8	**Withdrawal of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks); OR 2. Should the relief sought in point 1) not occur, the Submitter seeks the relief set out in submission; AND 3. Any other relief (including consequential relief) to give effect to the decisions sought in submission;**
S169.045	General comments	General comments – overall	Oppose	Opposes Chapter 9	**Withdrawal of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks); OR 2. Should the relief sought in point 1) not occur, the Submitter seeks the relief set out in submission; AND 3. Any other relief (including consequential relief) to give effect to the decisions sought in submission;**
S169.046	General comments	General comments - overall	Oppose	Opposes Chapter 12	**Withdrawal of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks); OR 2. Should the relief sought in point 1) not occur, the Submitter seeks the relief set out in submission; AND 3. Any other relief (including consequential relief) to give effect to the decisions sought in submission;**
S169.047	General comments	General comments - maps	Oppose	Opposes Chapter	**Withdrawal of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks); OR 2. Should the relief sought in point 1) not occur, the**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					Submitter seeks the relief set out in submission; AND 3. Any other relief (including consequential relief) to give effect to the decisions sought in submission;
S169.048	General comments	General comments - overall	Oppose	Notes there are several drafting errors in PC1 resulting in unintended consequences due to provisions taking immediate legal effect. Considers the Clause 16 amendments addresses some of these errors, but several uncertainties remain Concerned a number of questions asked at Q&A session have been deferred to GWRC's legal counsel and remain unanswered Considers the application and interpretation of provisions remain in a state of flux with adverse outcomes for consenting housing and land development projects	**Withdrawal of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks); OR 2. Should the relief sought in point 1) not occur, the Submitter seeks the relief set out in submission; AND 3. Any other relief (including consequential relief) to give effect to the decisions sought in submission;**
S169.049	General comments	General comments - earthworks	Not Stated	Opposes requirement for a non-complying resource consent to undertake winter earthworks. Considers large rain events at any time cause larger pulses of sediment than discharges of sediment over the winter period and the current practice for managing winter earthworks with GWRC oversight is sufficient. Considers this existing practice should be retained where it is managed through a separate approvals process against established GWRC criteria. Considers the non-complying activity status doesn't consider scale, nature or duration of the works or specific site conditions. Concerned that stabilising earthworks before the shutdown period may not always be feasible and may result in other perverse environmental outcomes. Considers blanket restrictions are not the most effective approach to address diverse challenges on different sites and	**Withdrawal of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks); OR 2. Should the relief sought in point 1) not occur, the Submitter seeks the relief set out in submission; AND 3. Any other relief (including consequential relief) to give effect to the decisions sought in submission;**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				areas Considers where applicants demonstrate that winter works can be managed, this should be supported to avoid unnecessary delay of housing supply	
S169.050	General comments	General comments - unplanned greenfield development	Oppose	Opposes provisions relating to unplanned greenfield growth as the prohibited activity status provides no consenting pathway for proposals that may have positive outcomes. Considers the prohibited activity status is inappropriate from an effects management perspective given the Section 32 evaluation indicates that all contaminants can be addressed through a combination of treatment and financial contributions Opposes the requirement for two plan changes to enable greenfield development on the basis that it will create challenges for the private sector's responsiveness to the housing needs, is onerous and costly, and could jeopardise the economic viability of development and supply of affordable housing.	**Withdrawal of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks);** **OR** **2. Should the relief sought in point 1) not occur, the Submitter seeks the relief set out in submission;** **AND** **3. Any other relief (including consequential relief) to give effect to the decisions sought in submission;**
S169.051	General comments	General comments - stormwater management	Not Stated	Concerned there is insufficient detail on what types of hydrological controls and water sensitive design are required for development. Considers the conditions will pose a significant burden on property owners/developers requiring impervious surface treatment and a reduction in contaminants through building materials Considers engineering advice should not be a requirement for the design of site specific controls for the creation of small areas of impervious surface.	**Withdrawal of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks);** **OR** **2. Should the relief sought in point 1) not occur, the Submitter seeks the relief set out in submission;** **AND** **3. Any other relief (including consequential relief) to give effect to the decisions sought in submission;**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Concerned the s32 evaluation doesn't adequately assess the implication costs of PC1 and its impacts on urban growth to support population growth and economic development.	
S169.052	General comments	General comments - economic cost/impact	Not Stated	Concerned PC1 will have significant impacts on housing affordability and land development and this has not been addressed by PC1. Considers the introduction of a significant financial contribution for new residential units is burdensome and will have cascading effects on housing affordability throughout the region and will impede urban growth and intensification. Considers the new requirements are inconsistent with Objective 2 and housing affordability policies of the NPS-UD which have not been addressed in the section 32 report. Concerned the impact of PC1 on land owners and developers and the commercial viability of the private sector has not been assessed. Strongly opposes Schedule 30 and associated provisions Considers the acknowledgement that stormwater contaminant treatment is only practicable for a portion of the contaminant load highlights the limitations of the proposed solution Believes the policy heavily relies on financial contributions without consideration for alternatives or new developments that improve water quality. Concerns the use of financial contributions to offset stormwater contaminations is not equitable or efficient. Policy WH.P15 and P.P13 outline the anticipation of potential deterioration in water quality which should prompt exploration of solutions rather than relying on financial contributions. Concerned the feasibility, effectiveness and timing	**Withdrawal of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks);** **OR** **2. Should the relief sought in point 1) not occur, the Submitter seeks the relief set out in submission;** **AND** **3. Any other relief (including consequential relief) to give effect to the decisions sought in submission;**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				of catchment-scale stormwater treatment systems referenced in Schedule 30 is unclear. Opposes GWRC's requirement for financial contributions even if a development could achieve an 85% reduction or more. Believes there is no effects-based reason for the charging of the proposed contribution which is inconsistent with the purported purpose outlined by the GWRC.	

S243 Land Matters Limited

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S243.001	General comments	General comments - definitions	Amend	Questions what types of development PC1 relates to. Considers Rural Lifestyle or Rural development should be excluded.	Provide definition of "Greenfield Development" definition
S243.002	8 Whaitua Te Whanganui-a-Tara	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Amend	Considers use of stormwater control to effectively manage or prevent land use inconsistent with integrated management principles contained in RMA.	Seeks objectives and policies be deleted or amended to provide opportunities for development within Porirua Whaitua. If not deleted, requests objectives and policies be amended to remove avoidance principles and be replaced with objectives and policies of same effect/guidance as NRP before notification with some policy relief for activities that require consent under the operative provisions.
S243.003	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater	Amend	Considers use of stormwater control to effectively manage or prevent land use inconsistent with integrated management principles contained in RMA.	Seeks objectives and policies be deleted or amended to provide opportunities for development within Porirua Whaitua. If not deleted, requests objectives and policies be amended to remove avoidance principles and be replaced with objectives and policies of same effect/guidance as NRP

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discharges.			before notification with some policy relief for activities that require consent under the operative provisions.
S243.004	8 Whaitua Te Whanganui-a-Tara	Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy.	Amend	Considers use of stormwater control to effectively manage or prevent land use inconsistent with integrated management principles contained in RMA.	Seeks objectives and policies be deleted or amended to provide opportunities for development within Porirua Whaitua. If not deleted, requests objectives and policies be amended to remove avoidance principles and be replaced with objectives and policies of same effect/guidance as NRP before notification with some policy relief for activities that require consent under the operative provisions.
S243.005	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Considers use of stormwater control to effectively manage or prevent land use inconsistent with integrated management principles contained in RMA.	Seeks objectives and policies be deleted or amended to provide opportunities for development within Porirua Whaitua. If not deleted, requests objectives and policies be amended to remove avoidance principles and be replaced with objectives and policies of same effect/guidance as NRP before notification with some policy relief for activities that require consent under the operative provisions.
S243.006	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Amend	Considers use of stormwater control to effectively manage or prevent land use inconsistent with integrated management principles contained in RMA.	Seeks objectives and policies be deleted or amended to provide opportunities for development within Porirua Whaitua. If not deleted, requests objectives and policies be amended to remove avoidance principles and be replaced with objectives and policies of same effect/guidance as NRP before notification with some policy relief for activities that require consent under the operative provisions.
S243.007	8 Whaitua Te	Policy WH.P16:	Amend	Considers use of stormwater control to effectively manage or prevent land use inconsistent with	Seeks objectives and policies be deleted or amended to provide opportunities for development within Porirua

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	Stormwater discharges from new unplanned greenfield development.		integrated management principles contained in RMA.	Whaitua. If not deleted, requests objectives and policies be amended to remove avoidance principles and be replaced with objectives and policies of same effect/guidance as NRP before notification with some policy relief for activities that require consent under the operative provisions.
S243.008	9 Te Awarua-o-Porirua Whaitua	Objective P.O1: The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is waiora by 2100.	Amend	Considers use of stormwater control to effectively manage or prevent land use inconsistent with integrated management principles contained in RMA.	Seeks objectives and policies be deleted or amended to provide opportunities for development within Porirua Whaitua. If not deleted, requests objectives and policies be amended to remove avoidance principles and be replaced with objectives and policies of same effect/guidance as NRP before notification with some policy relief for activities that require consent under the operative provisions.
S243.009	9 Te Awarua-o-Porirua Whaitua	Objective P.O2: Te Awarua-o-Porirua's groundwater, rivers, lakes and	Amend	Considers use of stormwater control to effectively manage or prevent land use inconsistent with integrated management principles contained in RMA.	Seeks objectives and policies be deleted or amended to provide opportunities for development within Porirua Whaitua. If not deleted, requests objectives and policies be amended to remove avoidance principles and be replaced with objectives and policies of same effect/guidance as NRP

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		natural wetlands, and their margins are on a trajectory of measurable improvement towards wai ora.			before notification with some policy relief for activities that require consent under the operative provisions.
S243.010	9 Te Awarua-o-Porirua Whaitua	Objective P.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Pāuatahanui Inlet, Onepoto Arm and the open coastal areas of Te Awarua-o-Porirua is maintained or improved to achieve the coastal	Amend	Considers use of stormwater control to effectively manage or prevent land use inconsistent with integrated management principles contained in RMA.	Seeks objectives and policies be deleted or amended to provide opportunities for development within Porirua Whaitua. If not deleted, requests objectives and policies be amended to remove avoidance principles and be replaced with objectives and policies of same effect/guidance as NRP before notification with some policy relief for activities that require consent under the operative provisions.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		water objectives set out in Table 9.1.			
S243.011	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	Considers use of stormwater control to effectively manage or prevent land use inconsistent with integrated management principles contained in RMA.	Seeks objectives and policies be deleted or amended to provide opportunities for development within Porirua Whaitua. If not deleted, requests objectives and policies be amended to remove avoidance principles and be replaced with objectives and policies of same effect/guidance as NRP before notification with some policy relief for activities that require consent under the operative provisions.
S243.012	9 Te Awarua-o-Porirua Whaitua	Policy P.P4: Contaminant load reductions.	Amend	Considers use of stormwater control to effectively manage or prevent land use inconsistent with integrated management principles contained in RMA.	Seeks objectives and policies be deleted or amended to provide opportunities for development within Porirua Whaitua. If not deleted, requests objectives and policies be amended to remove avoidance principles and be replaced with objectives and policies of same effect/guidance as NRP before notification with some policy relief for activities that require consent under the operative provisions.
S243.013	9 Te Awarua-o-Porirua Whaitua	Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Amend	Considers use of stormwater control to effectively manage or prevent land use inconsistent with integrated management principles contained in RMA.	Seeks objectives and policies be deleted or amended to provide opportunities for development within Porirua Whaitua. If not deleted, requests objectives and policies be amended to remove avoidance principles and be replaced with objectives and policies of same effect/guidance as NRP before notification with some policy relief for activities that require consent under the operative provisions.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S243.014	9 Te Awarua-o-Porirua Whaitua	Policy P.P10: Managing adverse effects of stormwater discharges.	Amend	Considers use of stormwater control to effectively manage or prevent land use inconsistent with integrated management principles contained in RMA.	Seeks objectives and policies be deleted or amended to provide opportunities for development within Porirua Whaitua. If not deleted, requests objectives and policies be amended to remove avoidance principles and be replaced with objectives and policies of same effect/guidance as NRP before notification with some policy relief for activities that require consent under the operative provisions.
S243.015	9 Te Awarua-o-Porirua Whaitua	Policy P.P12: Managing stormwater network discharges through a Stormwater Management Strategy.	Amend	Considers use of stormwater control to effectively manage or prevent land use inconsistent with integrated management principles contained in RMA.	Seeks objectives and policies be deleted or amended to provide opportunities for development within Porirua Whaitua. If not deleted, requests objectives and policies be amended to remove avoidance principles and be replaced with objectives and policies of same effect/guidance as NRP before notification with some policy relief for activities that require consent under the operative provisions.
S243.016	9 Te Awarua-o-Porirua Whaitua	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Considers use of stormwater control to effectively manage or prevent land use inconsistent with integrated management principles contained in RMA.	Seeks objectives and policies be deleted or amended to provide opportunities for development within Porirua Whaitua. If not deleted, requests objectives and policies be amended to remove avoidance principles and be replaced with objectives and policies of same effect/guidance as NRP before notification with some policy relief for activities that require consent under the operative provisions.
S243.017	9 Te Awarua-o-Porirua Whaitua	Policy P.P14: Stormwater contaminant	Amend	Considers use of stormwater control to effectively manage or prevent land use inconsistent with integrated management principles contained in RMA.	Seeks objectives and policies be deleted or amended to provide opportunities for development within Porirua Whaitua. If not deleted, requests objectives and policies be amended to remove avoidance principles and be replaced with

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		offsetting for new greenfield development.			objectives and policies of same effect/guidance as NRP before notification with some policy relief for activities that require consent under the operative provisions.
S243.018	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Amend	Considers use of stormwater control to effectively manage or prevent land use inconsistent with integrated management principles contained in RMA.	Seeks objectives and policies be deleted or amended to provide opportunities for development within Porirua Whaitua. If not deleted, requests objectives and policies be amended to remove avoidance principles and be replaced with objectives and policies of same effect/guidance as NRP before notification with some policy relief for activities that require consent under the operative provisions.
S243.019	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Amend	Considers need for flexibility in policy for management of adverse effects of earthworks during certain periods. Considers policy is too blunt in its approach.	Delete or amend to provide for winter works subject to circumstantial criterion. That could include: Risk or likelihood of discharge; Topographical considerations/slope; Management of works; Distance to freshwater resources; Necessity of works; Economic considerations.
S243.020	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Concerns the rules and standards will capture nearly all residential subdivision and nearly all proposals will fail the permitted standards. Notes this will add significant cost to urban development that is not effectively assessed in Council's s32 analysis. Concerns costs imposed will lead to further housing unaffordability and further escalation of house pricing. Notes where a subdivision creates a stormwater catchment in excess of 4ha then a controlled activity consent may be required and considers this should be the only standard that applies to the rule structure.	Seeks rules be deleted. If rule framework is to remain, seeks areas in conditions attached to rules should be amended to provide a more realistic area calculation.
S243.021	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new	Amend	Concerns the rules and standards will capture nearly all residential subdivision and nearly all proposals will fail the permitted standards. Notes this will add significant cost to urban development	Seeks rules be deleted. If rule framework is to remain, seeks areas in conditions

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		greenfield impervious surfaces - controlled activity.		that is not effectively assessed in Council's s32 analysis. Concerns costs imposed will lead to further housing unaffordability and further escalation of house pricing. Notes where a subdivision creates a stormwater catchment in excess of 4ha then a controlled activity consent may be required and considers this should be the only standard that applies to the rule structure.	attached to rules should be amended to provide a more realistic area calculation.
S243.022	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Amend	Concerns the rules and standards will capture nearly all residential subdivision and nearly all proposals will fail the permitted standards. Notes this will add significant cost to urban development that is not effectively assessed in Council's s32 analysis. Concerns costs imposed will lead to further housing unaffordability and further escalation of house pricing. Notes where a subdivision creates a stormwater catchment in excess of 4ha then a controlled activity consent may be required and considers this should be the only standard that applies to the rule structure.	Seeks rules be deleted. If rule framework is to remain, seeks areas in conditions attached to rules should be amended to provide a more realistic area calculation.
S243.023	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Amend	Concerns the rules and standards will capture nearly all residential subdivision and nearly all proposals will fail the permitted standards. Notes this will add significant cost to urban development that is not effectively assessed in Council's s32 analysis. Concerns costs imposed will lead to further housing unaffordability and further escalation of house pricing. Notes where a subdivision creates a stormwater catchment in excess of 4ha then a controlled activity consent may be required and considers this should be the only standard that applies to the rule structure.	Seeks rules be deleted. If rule framework is to remain, seeks areas in conditions attached to rules should be amended to provide a more realistic area calculation.
S243.024	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped	Amend	Concerns the rules and standards will capture nearly all residential subdivision and nearly all proposals will fail the permitted standards. Notes this will add significant cost to urban development that is not effectively assessed in Council's s32 analysis. Concerns costs imposed will lead to	Seeks rules be deleted. If rule framework is to remain, seeks areas in conditions attached to rules should be amended to provide a more realistic area calculation.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		impervious surfaces - permitted activity.		further housing unaffordability and further escalation of house pricing. Notes where a subdivision creates a stormwater catchment in excess of 4ha then a controlled activity consent may be required and considers this should be the only standard that applies to the rule structure.	
S243.025	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Concerns the rules and standards will capture nearly all residential subdivision and nearly all proposals will fail the permitted standards. Notes this will add significant cost to urban development that is not effectively assessed in Council's s32 analysis. Concerns costs imposed will lead to further housing unaffordability and further escalation of house pricing. Notes where a subdivision creates a stormwater catchment in excess of 4ha then a controlled activity consent may be required and considers this should be the only standard that applies to the rule structure.	Seeks rules be deleted. If rule framework is to remain, seeks areas in conditions attached to rules should be amended to provide a more realistic area calculation.
S243.026	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas- controlled activity.	Amend	Concerns the rules and standards will capture nearly all residential subdivision and nearly all proposals will fail the permitted standards. Notes this will add significant cost to urban development that is not effectively assessed in Council's s32 analysis. Concerns costs imposed will lead to further housing unaffordability and further escalation of house pricing. Notes where a subdivision creates a stormwater catchment in excess of 4ha then a controlled activity consent may be required and considers this should be the only standard that applies to the rule structure.	Seeks rules be deleted. If rule framework is to remain, seeks areas in conditions attached to rules should be amended to provide a more realistic area calculation.
S243.027	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped	Amend	Concerns the rules and standards will capture nearly all residential subdivision and nearly all proposals will fail the permitted standards. Notes this will add significant cost to urban development that is not effectively assessed in Council's s32 analysis. Concerns costs imposed will lead to further housing unaffordability and further escalation	Seeks rules be deleted. If rule framework is to remain, seeks areas in conditions attached to rules should be amended to provide a more realistic area calculation.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		impervious surfaces-discretionary activity.		of house pricing. Notes where a subdivision creates a stormwater catchment in excess of 4ha then a controlled activity consent may be required and considers this should be the only standard that applies to the rule structure.	
S243.028	9 Te Awarua-o-Porirua Whaitua	Rule P.R11: All other stormwater discharges - non-complying activity.	Amend	Concerns the rules and standards will capture nearly all residential subdivision and nearly all proposals will fail the permitted standards. Notes this will add significant cost to urban development that is not effectively assessed in Council's s32 analysis. Concerns costs imposed will lead to further housing unaffordability and further escalation of house pricing. Notes where a subdivision creates a stormwater catchment in excess of 4ha then a controlled activity consent may be required and considers this should be the only standard that applies to the rule structure.	Seeks rules be deleted. If rule framework is to remain, seeks areas in conditions attached to rules should be amended to provide a more realistic area calculation.
S243.029	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Oppose	Considers it not appropriate to use stormwater rules to effectively prohibit consideration of certain land uses. Notes land use control is a territorial function, not a regional council function. Considers prohibited activities do not provide for a flexible approach to changes in land use that may result in environmental benefits.	Remove prohibited activities rules for stormwater discharges.
S243.030	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development -	Oppose	Considers it not appropriate to use stormwater rules to effectively prohibit consideration of certain land uses. Notes land use control is a territorial function, not a regional council function. Considers prohibited activities do not provide for a flexible approach to changes in land use that may result in environmental benefits.	Remove prohibited activities rules for stormwater discharges.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		prohibited activity.			
S243.031	12 Schedules	Schedule 27: Freshwater Action Plan requirements.	Amend	Considers information in schedule is not commensurate to scale of individual developments.	Remove or simplify this schedule. Plans should relate to functional engineering considerations and NZS4404 should be used as basis of plan.
S243.032	12 Schedules	Schedule 30: Financial Contributions.	Oppose	For the reasons given under other parts of submission, there should not be financial contributions on stormwater discharges. Notes it is not specific or clear what the financial contributions will be used or taken for.	Remove need to provide financial contributions for stormwater discharges.
S243.033	General comments	General comments - overall	Oppose	Considers PC1 has been hastily prepared and is having unintended effects as a result of drafting errors, and are creating significant implications for housing affordability and land viability already due to the immediate legal effect of provisions.	Withdrawal of PC1 to allow for a comprehensive review of provisions of plan change as they relate to national guidance
S243.034	General comments	General comments - current legislation	Oppose	Notes the agreements of the government coalition to remove/replace legislation and suggest withdrawal of PC1 to allow a comprehensive review of PC1 provisions as they relate to national guidance.	Withdrawal of PC1 to allow for a comprehensive review of provisions of plan change as they relate to national guidance.
S243.035	General comments	General comments - urban development	Oppose	Considers PC1 has significant consequences for affordability of housing and land development in Wellington Region. Notes addition of a significant financial contribution for new residential units will have flow on housing affordability effects in the region and is inconsistent with Objective 2 and associated policies of NPS-UD. Concerns this has not been considered in the Section 32 report and completely ignores the affordability implications of the proposed changes.	Withdrawal of PC1 to allow for a comprehensive review of provisions of plan change as they relate to national guidance.
S243.036	General comments	General comments - urban	Oppose	Concerns PC1 introduces increased uncertainty and cost to the provision of housing in Wellington region, directly affecting housing affordability.	Remove the new requirements for stormwater management and financial contributions from all new stormwater discharge provisions or amended to provide a more balanced approach to catchment management.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		development		Considers requirement for financial contributions and risk cost introduced through additional consenting will have flow on effects to the cost of housing in the region and is inconsistent with Objective 2 and associated policies of NPS-UD.	

S027 Lara Keane

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S27.001	5.2 and 5.3 Discharges to land and water and land use rules	5.2 and 5.3 Discharges to land and water and land use rules	Support	Supports PC1 provisions regarding water and the Te Whanganui-a-Tara catchment objectives. Seeks for beaches to be swimmable year-round. Supports promoting activities on brownfield activity over greenfield activity. Considers that collaboration is necessary for the resourcing of improving water. Suggests councils collectively resource enforcement, science and complementary policy tools.	Retain as notified [inferred]

S011 Lindsay Jenkin

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S11.001	2 Interpretation	Stock unit	Amend	Smaller animals are not comparable to regular sized farm animals in terms of stock unit. Smaller breeds should be included as stock units in the definition through alternative weight ranges.	Amend the stock unit list to: - include the typical types of animals small block farms tend to run (list of examples provided in full submission). - Use a weight range calculation for equivalent stock units so that smaller animals can be accounted for.

S009 Louise Askin

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S9.001	General comments	General comments - overall	Support	Supports the group submission made by Mākara/Ohariu farmers'.	Not Stated.
S9.002	General comments	General comments - overall	Amend	Concerned PC1 detail is very different from WIP and considers requirement for testing through consultation to assess the reflection of community recommendations.	Not Stated.
S9.003	General comments	General comments - overall	Amend	Concerned the partnership approach recommended by WIP has not continued into PC1 delivery process and document. Considers it important for PC1 to prioritise partnership mechanisms, recognise the values and to provide a equitable and effective approach. Considers it important for GWRC actively considers impacts of these provisions on local communities in order to design support. Considers GWRC has not investigated the extent of waterway protection required under the provisions, land retirement (based on lay of the land opposed to mapped polygons) or financial implications for farmers. Concerned the ETS liabilities for not replanting forestry on certain land classes has not been considered.	Not Stated.
S9.004	General comments	General comments - overall	Amend	Considers PC1 should provide catchment context by incorporating whaitua-wide policies and prioritisation tools (e.g. mapping) as non-regulatory support to inform farm plans. Suggests this will result in robust (certified and audited) FWFP but will ensure farms can identify actual issues and solutions for unique landscapes and avoid regulatory "by-catch" from broad rules. Notes the Government's recent changes to the NPS-FM and timeframes for implementation may	Not Stated.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				change the effectiveness of this WIP recommendation.	
S9.005	General comments	General comments - overall	Amend	Notes the Government's recent changes to the NPS-FM and timeframes for implementation may change the effectiveness of this WIP recommendation.	Not Stated.
S9.006	General comments	General comments - overall	Amend	Notes PC1 was prepared swiftly to implement regulatory measures within NPS-FM timeframe and for GWRC's longer-term commitment to non-regulatory measures. Concerned non-regulatory measures outside of PC1 haven't occurred yet. Notes WIP identified fundamental barriers in the geographic areas such as: lack of data on the issue, identification solutions, need for community catchment group support, need for additional funding for on-farm works and a current lack of GWRC's compliance/enforcement of poor practice.	Give non-regulatory measures equal priority to PC1 (including outside of PC1 development process) and apply these measures in areas where regulation will be most prominent
S9.007	General comments	General comments - consultation	Amend	Concerned of PC1 public consultation process, with community awareness relying on local information channels and as PC1 will have significant implications for Wellington (particularly rural landowners), a higher level of community engagement is warranted.	Not Stated.
S9.008	6 Other methods	Method M42: Small farm property registration within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	Considers it is unclear why this is listed as a key method when the design of associated policies and rules appear to have low impact. Considers this will have high compliance costs with low outcomes.	Clarify the scope and purpose of this method and either strengthen or remove. Oppose if there is no appropriate benefit from this process shown.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S9.009	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Amend	Seeks implementation of WIP recommendations 10, 11, 13, 14, 15 and 36. Considers the lack of water quality monitoring data and information on contaminant sources is a key limitation on the communities' ability to effect change in Mākara/Ohariu. Concerned support for catchment groups (urban and rural) is lacking in PC1. Considers PC1 needs to support community development of local catchment context and not rely on WIP or FWAP.	Expand list to include other important non-regulatory measures proposed in the WIP, including support for catchment groups, additional water quality monitoring programmes, provision of local information/data, development of "catchment context, challenges and values".
S9.010	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Support	Supports new focus on small rural properties as they may have different information channels compared to farms. Concerned GWRC has progressed the development of regulatory tools (PC1) but not additional non-regulatory tools as proposed in WIP. Concerned this has lost a communication opportunity during PC1 consultation stage, as GWRC could have presented communities with both regulatory tools and non-regulatory support, opposed to just the new rules.	Supports. Add **"in partnership with community"** in the description. Progress implementation with haste.
S9.011	8 Whaitua Te Whanganui-a-Tara	Objective WH.O2: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and	Amend	Supports the objectives as they reflect many objectives in the WIP, but is concerned the wording does not acknowledge the value that rural communities place on productive land use or the role that they have as direct kaitaki for Wellington's waterways.	Add:**(i) Rural communities are thriving and integrating productive land use and healthy waterways on farms, forests and lifestyle blocks.**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora.			
S9.012	8 Whaitua Te Whanganui-a-Tara	8.2 Policies	Amend	Seeks implementation of WIP recommendation 32 and notes this doesn't appear elsewhere in PC1.	Include a policy on septic tanks in section 8.2.
S9.013	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	Notes other sections of PC1 do not drive total stock exclusion from all waterways, but instead apply practical assessments that allow for other methods.	Amend as follows:~~"excluding livestock from waterbodies"~~ to **"reducing livestock access to waterbodies".**
S9.014	8 Whaitua Te Whanganui-a-Tara	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of	Amend	Reference that WIP recommendations 10 and 13 state need for communities to be involved in catchment planning. Considers it unclear whether FWAP are intended to replace catchment plans. Presumes not a replacement due to being larger scale. Considers if FWAP are to include on-farm actions, then it should be essential that farmers and rural communities are key partners in development.	Include the rural community in the development of Action Plans.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		waterways.			
S9.015	8 Whaitua Te Whanganui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Amend	Seeks implementation of WIP recommendation 15. Concerned the source of high e-coli levels in Mākara Stream is unknown and there are several potential sources. Considers the sources and levels need to be known for each catchment to be addressed effectively.	Add:**"Identification of sources of e-coli specific to individual catchments".**
S9.016	8 Whaitua Te Whanganui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Amend	Seeks implementation of WIP recommendation 33. Considers work to reduce E-coli levels should only target areas where e-coli is shown to be an issue and there is not currently sufficient monitoring data to determine the levels and sources of e-coli across the multiple catchments. Considers it inappropriate to extrapolate the results of one monitoring site. Seeks landowner farm-scale monitoring be provided for - including feedback loops to monitor the impact of actions.	Add:**"Incorporate e-coli reduction in catchment context and farm environment plans, based on monitored data"** - to allow a farm-scale approach as already proposed for nitrogen and sediment.
S9.017	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high	Amend	Seeks implementation of WIP recommendations 33 and 36. Considers "woody vegetation" is only one option for land treatment and is a challenge to establish in exposed Mākara/Ohariu areas. Notes Meridian Energy does not allow revegetation with plants over 1m on many ridgelines across several of the largest local farms due to their disruption of wind flow. Considers the provision's requirement to maintain the woody vegetation will be unviable due to large-	Opposes (c). Use erosion/sediment risk treatment plans to identify the most appropriate methods and timeframes for managing sediment loss on each unique site.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		risk of erosion.		scale land retirement and reduced farm income from reduced production and high fencing costs incurred. Considers working alongside Meridian's windfarm an additional challenge where afforestation needs to be designed to no impede wind flow.	
S9.018	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	Seeks implementation of WIP recommendation 36. Considers given the area's geology, the land mapped as the top 10% of unvegetated land at risk of erosion captures areas where erosion risk is not high. Concerned map applied at property-scale creates significant cost to land-owners. Considers on-farm actions need to be based on farm-scale assessment of erosion risks. Notes this is common practice in NZ and GWRC's existing erosion control programmed in Wairarapa. Notes regional mapping is used in other regions to prioritise landowner engagement and farm investment in land treatment and considers it is rarely used to regulate land treatment in regions where erosion risk is extreme. Concerned this policy assumes erosion from steep land is the key source of sediment but anecdotally streambank erosion from high flood flows is a key contributor of sediment in Mākara Stream catchment. Concerned retirement area will be much larger than mapped polygons due to need to aggregate areas and work with the landscapes to locate sensible fence lines.	Remove section (a) or modify to say "identifying highest erosion risk land (pasture)... at a farm-scale." Amend to focus on identifying "sediment sources" rather than solely erosion risk.
S9.019	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in	Amend	Seeks implementation of WIP recommendation 36. Supports sediment/erosion risk treatment plans based on farm-scale assessment not whaitua-scale mapping.	Refocus (b) from "erosion risk treatment plan" to "erosion and sediment risk treatment plan".

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		sediment discharges from farming activities on land with high risk of erosion.		Considers the sources of sediment are likely broader than hillside erosion in the Mākara and Ohariu catchments. Considers focus should be on broader topic of "sediment" to acknowledge the role of other existing sediment sources and management techniques such as low stocking rates and good pasture cover.	
S9.020	8 Whaitua Te Whanganui-a-Tara	Policy WH.P24: Phasing of farm environment plans.	Amend	Seeks implementation of WIP recommendation 34. Seeks phasing time is timed to best integrate with national roll out of FWFP so farmers are not duplicating efforts.	Revise the date for FEPs to be prepared and certified if this is inconsistent with the FWFP roll out.
S9.021	8 Whaitua Te Whanganui-a-Tara	Policy WH.P26: Managing livestock access to small rivers.	Amend	Seeks implementation of WIP recommendation 34. Considers this policy be made consistent with the associated rule (or broader intent) regarding reduced access rather than restricted access. Considers fencing tool is limited in Mākara and Ohariu as areas are incredibly hilly and notes a good proportion of Mākara and Ohariu's large streams won't be covered in national stock exclusion regulations. Considers need to focus on actual risk from stock access to rivers in low intensity farms, regarding frequency of livestock access and actual impact on stream banks and water quality.	Replace "restrict" with "reduce through non-regulatory means". Shift the focus on non-regulatory drivers, as per the WIP recommendation. Amend the wording to clarify what size river is covered in this policy - and ensure that the title and policy wording are consistent.
S9.022	8 Whaitua Te Whanganui-a-Tara	Policy WH.P27: Promoting stream shading.	Support	Considers policy can be enacted through native reversion, native planting or poplar/willow pole planting.	Retain as notified.
S9.023	8 Whaitua Te	Rule WH.R17:	Amend	Seeks implementation of WIP recommendation 36.	Note "high erosion risk land as identified in individual erosion risk management plans".

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	Vegetation clearance on highest erosion risk land - permitted activity.		Considers farm-scale assessments of highest risk land be used rather than current whaitua-wide mapping.	
S9.024	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land - controlled activity.	Amend	Seeks implementation of WIP recommendation 36. Considers farm-scale assessments of highest risk land be used rather than current whaitua-wide mapping.	Note "highest erosion risk land as identified in individual erosion risk management plans".
S9.025	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Amend	Considers it is unclear whether mapping is fit for purpose and suggests comparing against best practice mapping tools. Considers forestry is an effective soil conservation tool on erosion prone land, dependent on the severity of erosion risk and forestry type. Suggests prioritising productive/protective options for erosion prone land where suitable. Notes in Mākara/Ohariu, pine is one of the only tree species that will grow in wind exposed areas (other than low native scrub).	Review whether mapping is fit for purpose.
S9.026	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20	Amend	Considers provision has strong focus on nitrogen management, whereas WIP notes small properties may also contribute to e-coli levels. Considers a need to focus the work on catchment issues for small properties. Supports the use of "stock units" instead of livestock to determine farming intensity as considers it takes	Include assessment of e-coli risk. Remove farm registration requirement - limited benefit. Clarify 4-20ha based on "effective grazing area" or similar.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		hectares - permitted activity.		into account diversity of livestock species on smaller properties. Concerned there is not good rationale for farm registration, particularly if nitrogen monitoring does not require reporting. Notes PC1 wording does not include requirement for any form of livestock exclusion from waterways other than national rules. Considers the smaller properties should have the same level of stock exclusion requirements, even if not through a full FEP. Considers the approach to determining what properties the provision applies to, is inconsistent with larger farms and should be based on effective grazing area.	
S9.027	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Amend	Considers any farm environment plan work above the national regulations can contribute to FWFP as catchment context. Submitter recommends if rule is retained, that these two plans/programmes are designed to inform FWFP. Considers this provision is disproportionate to the treatment of larger streams. Considers in Mākara/Ohariu, a minor proportion of larger streams will require livestock exclusion under national regulations due to difficult topography. Suggests small streams should be part of a farm's assessment of waterway health and contaminant sources instead, oppose to a standalone programme. Considers this is relevant given the low farm stocking rates.	Ensure that the details of this rule are consistent with the content and timeframes for Freshwater Farm Plans. Remove the requirement for a Small Stream Riparian Programme. Retain inclusion of an erosion/sediment risk treatment plan - as detail to inform the FWFP.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S9.028	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Seeks implementation of WIP recommendation 33. Notes WIP recommends farm plans incorporate more streams rather than just MfE's "low slope" map (regardless of size) but does not propose a regulatory approach. References submitter's comments against Policy WH. P26.	Remove (b) since farm environment plans can pick up planning for all streams and non-regulatory measures can support on-farm work.
S9.029	8 Whaitua Te Whanganui-a-Tara	Rule WH.R30: The use of land for farming activities - discretionary activity.	Amend	Seeks implementation of WIP recommendation 15. Considers there aren't enough water quality monitoring sites to make this provision useful or fair. Considers limitations on farming should only be placed on properties where nitrogen is a shown problem and not across whole FMU.	Adjust the scale at which this is applied - from FMU-scale to small catchments/farm - to allow for local differences in stream contaminant levels to be assessed.

S022 Lynn Cadenhead

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S22.001	General comments	General comments - water bodies	Not Stated	The state of water bodies reflects the use of land, water and other resources in their catchments.	Not stated.
S22.002	General comments	General comments - water bodies	Not Stated	Considers community values of many water bodies have been compromised but these streams and other water bodies continue to provide species' habitats. Considers that collective action through the regional plan is required to secure and improve waterbodies and ensure they remain community assets.	Not stated.
S22.003	General comments	General comments - water bodies	Support	Supports the direction of PC1 to require specific actions to improve water bodies over time. Recommends that interim and measurable milestones are set for achieving improved	Include interim and measurable milestones

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				freshwater outcomes to ensure that measures are effective.	
S22.004	General comments	General comments - overall	Support	Supports GWRC's Whaitua process, and supports the implementation of the recommendations made by Whaitua members to address freshwater issues.	Not stated.
S22.005	General comments	General comments - overall	Support	Supports the direction of PC1 with regard to water.	Not stated.
S22.006	General comments	General comments - target attribute states	Amend	Supports the proposed target attribute states. Seeks a fall-back date of 2035 should no other date be specified by 31 December 2026.	Include a fall-back date of 2035 should no other date be specified by 31 December 2026.
S22.007	General comments	General comments - water bodies	Amend	Seeks highest level of protection for waterways containing giant kokopu, shortjaw kokopu or lampreys, due to their vulnerability to environmental changes.	Provide highest level of protection for waterways containing giant kokopu, shortjaw kokopu or lampreys.
S22.008	General comments	General comments - unplanned greenfield development	Not Stated	Considers there should be no major development on greenfield land, and that existing urban areas are sufficient for housing densification.	Not stated.
S22.009	General comments	General comments - stormwater management	Support	Supports all provisions which require development that increases impermeable surfaces to achieve neutral or lesser stormwater runoff compared to pre-development. Notes that stormwater retention is necessary to avoid flashy rainfall runoff.	Not stated.
S22.010	General comments	General comments - economic cost/impact	Not Stated	Considers the costs of inaction (in the future) outweigh the financial cost to implement PC1.	Not stated.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S22.011	3 Objectives	Objective O19: Biodiversity, aquatic ecosystem health and mahinga kai in freshwater bodies and the coastal marine area are safeguarded.	Amend	Not stated	Objective O19 Biodiversity, aquatic ecosystem health and mahinga kai in freshwater bodies and the coastal marine area are safeguarded such that: (a) water quality, flows, water levels and aquatic and coastal habitats are managed to maintain **and improve** biodiversity, aquatic ecosystem health and mahinga kai, and (b) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a freshwater body or coastal marine area is meaningfully improved so that the objective is met within a reasonable timeframe, and (c) restoration of aquatic ecosystem health and mahinga kai is ~~encouraged~~ **undertaken and required where land is developed that contains freshwater bodies.** Note For the purposes of this objective 'a reasonable timeframe' is a date for the applicable water body or coastal marine area inserted into this Plan through the plan change/s required by the RMA to implement the NPS-FM 2020, or 2050 2035 if no other date is specified by 31 December 2026.
S22.012	3 Objectives	Table 3.4 Rivers and Streams.	Amend	Not stated	Mahinga kai species, including taonga species, are present in quantities, size and of a quality that is ~~appropriate for the area~~ **in a healthy ecological state** and reflective of a healthy functioning ecosystem. Huanga of mahinga kai as identified by mana whenua are achieved.
S22.014	12 Schedules	Objective O25: Outstanding water bodies identified in Schedule A (outstanding water bodies)	Support	Not stated	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and their significant values are protected and restored.			
S22.015	3 Objectives	Objective O28: Ecosystems and habitats with significant indigenous biodiversity values are protected from the adverse effects of use and development, and where appropriate restored to a healthy functioning state including as defined by Tables 3.4, 3.5, 3.6, 3.7 and 3.8.	Support	Not stated	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S22.016	4 Policies	Policy P30: Biodiversity, aquatic ecosystem health and mahinga kai.	Support	Not stated	Retain as notified
S22.017	4 Policies	Policy P78: Managing point source discharges for aquatic ecosystem health and mahinga kai.	Support	Not stated	Retain as notified
S22.018	5.4 Beds of lakes and rivers	5.4.8 Damming and diverting water	Amend	Considers issues around fish passage are not addressed (Rule R151A). Seeks for discretion to be available to require fish passage for activities which have existed for 10 years or more, where practical.	Enable discretion to require fish passage where practical.
S22.019	6 Other methods	6.16 Freshwater Action Plan programme	Support	Not stated	Retain as notified
S22.020	6 Other methods	Method M43: Supporting the health of urban waterbodies.	Support	Supports the health of, and funding for, urban waterbodies. Notes the benefit of endorsement by local authorities in existing and new development.	Not stated.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S22.021	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Support	Not stated	Retain as notified
S22.022	6 Other methods	Method M45: Funding of wastewater and stormwater network upgrades	Support	Supports the health of, and funding for, urban waterbodies. Notes the benefit of endorsement by local authorities in existing and new development.	Not stated.
S22.023	8 Whaitua Te Whanganui-a-Tara	8.1 Objectives	Support	Supports objectives WH.01-WH.09 however recommends interim milestones are set, supported by numerical objectives and monitoring programmes to meet desired outcomes.	Implement interim milestones supported by numerical objectives and monitoring programmes
S22.024	8 Whaitua Te Whanganui-a-Tara	Table 8.3 Primary contact site objectives in rivers.	Support	Supports numerical requirements for running waters in addition to those for lakes. Considers human health for contact recreation should be the standard where the water bodies are used for that purpose.	Human health for contact recreation be the standard where water bodies are used for that purpose
S22.025	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Support	Supports target attribute states	Retain as notified
S22.026	8 Whaitua Te Whanganui-a-Tara	8.2 Policies	Support	Supports policies WH.P1-P.33 including the associated target attribute states and flow requirements.	Retain as notified
S22.027	8 Whaitua Te Whanganui-a-Tara	8.3 Rules	Support	Supports Rules WH.R1 to WH.R36 and notes wherever possible, water sensitive urban design should be required to minimise increased runoff intensity due to increasing hard surfaces.	Include requirement for WSUD in Rules WH.R1-WH.R36 where possible.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S22.028	9 Te Awarua-o-Porirua Whaitua	9.1 Objectives	Support	Supports the provisions of Chapter 9	Retain as notified

S287 M. Wylie Garcia

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S287.001	General comments	General comments - consultation	Oppose	Considers that meaningful consultation on PC1 has not been undertaken	Withdraw PC1
S287.002	General comments	General comments - current legislation	Oppose	Questions the legality of the process undertaken by GWRC, citing recent Environment Court decisions.	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.
S287.003	General comments	General comments - current legislation	Oppose	Considers in any given catchment there will be upstream and downstream properties and very few indicative monitoring sites. Notes that the Mangaroa catchment and Akatarawa Valley are complex networks of waterways and all properties in the catchment will be assessed, based on the downstream results from this single monitoring point and penalised accordingly. Considers this unacceptable.	Remove all clauses where GWRC has failed to establish an adequate network of monitoring sites.
S287.004	General comments	General comments - current legislation	Oppose	Considers GWRC has decided that Freshwater Management is pre-eminent and over-rules other National Policy Statements. Considers GW has erroneously decided to regard clauses (a), (b) and (c) of the Te Mana o te Wai hierarchy as mutually exclusive rather than regarding them as equally weighted and inter-dependent. Considers that GWRC has chosen to give maximum weight to one piece of legislation and has	Give equal weighting to all government legislation and disregard regulation by committee.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				exacerbated that choice by taking in to account an opinion by one Whaitua in respect of levels of copper and zinc in stormwater which are not recognised in NPS-FM.	
S287.005	General comments	General comments - current legislation	Oppose	Considers there is confusion among GWRC staff and that contradictory advice has been given relating to the immediate legal effect of provisions and the fencing of waterways.	Delete the statement that all rules have immediate legal effect and substitute "all rules in this plan change will be held in abeyance pending the plan change passing through all stages required by the RMA."
S287.006	General comments	General comments - rural	Oppose	Considers GWRC do not know where sediment originates from and are guessing that it comes from farming activity and making the assumption that all sediment in rivers is the result of human activity. Considers it is important to take into account that a proportion arises from natural erosion processes and that it's important to form a complete picture of all factors within the catchments, both natural and man made. Considers within each of the Mangaroa and Akatarawa catchments GWRC should establish at least 3 monitoring points and accrue a significant data base to be able to identify the source of any quality reduction.	Defer any further action on PC1 pending gathering an effective database.
S287.007	General comments	General comments - rural	Oppose	Notes that the only animals referenced are cattle, farmed deer and farmed pigs and in the absence of any other stock being mentioned, considers that all such other animals are exempt from all rules.	Confirm that the rules are exclusive to these animals.
S287.008	General comments	General comments - rural	Oppose	Notes that land owners are required to furnish a complex range of data including average stocking rates, calculate effective grazing areas, map the property boundaries, show waterbodies where stock exclusion is required, show the location of fences relative to the waterbodies and calculations relating to Nitrogen emitting from the property Considers there will be very few in the community who will have the level of expertise required to gather and present the range of data required or produce accurate maps. Notes GWRC have not yet produced the systems	Delete the requirement for farms of 4 ha to register with GWRC . Require GWRC to have the necessary systems and applications in place prior to promulgating regulation that will not function appropriately without those systems. Confirm whether GWRC staff members have the authority to commit GWRC to a course of action which may be at variance to the letter of the drafted regulations.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				necessary to record the information. Concerned that resource consent application takes time, costs money and is beyond the technical abilities of most individuals and there is no guarantee that it will be approved or it may contain onerous conditions.	
S287.009	General comments	General comments - overall	Oppose	Considers there are errors in drafting which change the intended meaning	Review and undertake an edit of PC1
S287.010	General comments	General comments - rural	Oppose	Considers there is insufficient data to identify the point of origin of any contamination and PC1 requires registered farms to collect the data for GWRC at no cost to GWRC. Considers there are indicators from primary contact sites along the Hutt River that paint a clear picture and suggests this establishes that whatever contamination is present in the lower reaches is not originating from the farming communities of Akatarawa and Mangaroa. Suggests a disproportionate amount of effort in to trying to solve a problem that does not exist.	Move away from attributing contamination problems to farming and re-focus on the more complex issues of urban sources.
S287.011	General comments	General comments - water bodies	Oppose	Notes there are a number of references to small rivers, less than 1 metre wide but nowhere within the PC1 states what the minimum size is. Considers it unacceptable to have an open-ended definition for a minimum.	Clarify the definition upon which other regulations rely e.g. Stock exclusion and fencing rules. Provide a clear minimum width for small rivers
S287.012	General comments	General comments - rural	Oppose	Considers section 6.9 of the Section 32 report - (Sources of nitrogen and other contaminants) establishes that none of the measures aimed at the Mangaroa Valley and Akatarawa Valley farming community are justified. Considers the proposed measures will achieve little at an unquantified cost.	Withdraw all measures targeted at the Upper Hutt farming community.
S287.013	General comments	General comments - overall	Oppose	Considers there is no quantification for the benefits or quantification of the costs and that just because GWRC consider they are obliged to do something is not a valid reason to have no idea of the value or cost of the exercise.	Produce a thorough cost-benefit exercise and recognise ratepayers are not a limitless source of funds.

S051 Mākara and Ohariu large farms

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S51.001	General comments	General comments - overall	Not Stated	Supports individual submissions made by other members of the Mākara/Ohariu community. Does not support PC1 in its current form, noting that feedback on PC1 is similar to that provided in the Whaitua process. Notes work undertaken by the community to improve water quality and biodiversity, including retiring coastal and steep land; and revegetation of wetlands, streams and hillsides.	Not stated.
S51.002	General comments	General comments - consultation	Not Stated	Opposes PC1 on the basis of it having a broad regulatory approach and a lack of local consultation. Supports the improvement of water quality where it is shown to be poor and where solutions are within community control, provided that the necessary information is available. Seeks that GWRC collaborates with the local community rather than imposing regulations. Expressed concern with a lack of consultation and short timeframes to make submissions.	Not stated.
S51.003	General comments	General comments - economic cost/impact	Not Stated	High cost of implementing PC1 will fall to a small number of individual landowners rather than developers or communities as is the case for urban provisions. Concerned with how short timeframes for implementation in PC1 are. Seeks the removal of the regulatory approach for PC1, or otherwise that GWRC provides targeted support mechanisms to compensate for potential losses in farm income.	Remove the regulatory approach for PC1.
S51.004	General comments	General comments - freshwater	Not Stated	Considers there is currently insufficient water quality data to identify where work should be targeted. States that there is almost no data which identifies the source of sediment or e-coli in streams, nor natural levels of sediment and e-coli. Notes that there is only one water quality monitoring site for Mākara and Ohariu, which only covers the Mākara	Not stated.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Stream catchment. Considers there are streams within and outside the Mākara Stream catchment with good water quality, which would still be subject to land use restrictions. Seeks that a farm-scale and catchment-scale approach is adopted, rather than across a whaitua or Freshwater Management Unit.	
S51.005	General comments	General comments - overall	Not Stated	Concerned with how short the timeframes for implementation of PC1 are given the financial implications.	Revise the approach in PC1 to be more focused on community participation than regulation.
S51.006	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Not Stated	Supports financial support and rates relief for land retirement. Seeks for compensation for large-scale land retirement be included. Supports the farm-scale approach proposed.	Prioritise implementation of M44 prior to implementing new rules.
S51.007	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Amend	Considers the modelling and assumptions informing PC1 are not fit for purpose and the lack of real data makes it difficult to identify issues and work out what solutions are required.	GWRC to provide support for additional water quality monitoring in Makara and Ohariu catchments
S51.008	8 Whaitua Te Whanganui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Amend	States the sources of E. coli must be known for each catchment to be addressed appropriately. Notes inconsistency with WH.P22 and WH.P23 and considers that work to reduce E. coli should only be targeted in areas where it is shown to be an issue. Considers it is inappropriate to extrapolate the results of one monitoring site across all of Makara and Ohariu. Considers local water quality studies are necessary, and seeks an option to undertake landowner-led, farm-scale monitoring.	Add **"Identification of sources of e-coli specific to individual catchments".** Add **"Incorporate e-coli reduction in catchment context and farm plans, based on monitored data"**
S51.009	8 Whaitua Te	Policy WH.P23:	Amend	Regarding WH.P23(a), submitter expressed concern with the accuracy of the modelling and its	Refocus (a) to identify sediment sources rather than erosion risk

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.		appropriateness for the assessment of sediment loss risk from individual farms. Concerned with generic assumptions on sources of sediment. Concerned with a focus on hill country erosion rather than streambank erosion during rainfall events. Supports revegetation of vulnerable areas, however highlights that there are multiple options that work best within farm systems. Considers that due to farming practices, that more land will need to be retired than indicated in PC1. Regarding WH.P23(b), submitter emphasises the same comments made on WH.P23(a), particularly that there are likely more sources of erosion than from hillsides. Emphasised the role of other existing management techniques. Opposes WH.P23(c); Concerned about the timeframe for transitioning to woody vegetation and how long it will take for vegetation to establish given conditions at this location. Expressed concern about cost of maintaining woody vegetation and potential for growth of pest plants. Mentioned potential conflict between revegetation and nearby windfarms. Considers the modelling is inaccurate and that retirement of farmland should not be required where there are no erosion issues.	Amend (b) to focus on erosion risk rather than sediment management Remove (c) and rely on actions and timeframes identified through farm-scale assessment such as Freshwater Farm Plans
S51.010	8 Whaitua Te Whanganui-a-Tara	Policy WH.P26: Managing livestock access to small rivers.	Amend	Supports stream revegetation, however considers it costly and impractical within hilly landscapes. Notes potential for animal welfare issues if livestock cannot access streams for drinking water. Considers that a farm-scale approach is appropriate, rather than blanket restrictions. Seeks the policy to refer to reduced rather than restricted access.	[Inferred] Policy WH.P26: Managing livestock access to small rivers In addition to national stock exclusion regulations and the region-wide stock access requirements of Rule R98, Rule R99 or Rule R100 in this Plan, ~~restrict~~ **reduce through non-regulatory means** livestock access to a **small** river in the Mākara Stream and Mangaroa River catchments where the baseline state for the relevant part Freshwater Management Unit is below the national bottom line for visual clarity

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S51.011	8 Whaitua Te Whanganui-a-Tara	Policy WH.P27: Promoting stream shading.	Not Stated	Supports stream shading, noting that planting for shade will also contribute to stream bank stabilisation.	Retain as notified.
S51.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Amend	Considers that additional farm plan work is unnecessary when there are existing similar process under national regulation.	Ensure that the details of this rule are consistent with the content and timeframes for Freshwater Farm Plans.
S51.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Oppose	Supports stream revegetation, however considers it costly and impractical within hilly landscapes. Notes potential for animal welfare issues if livestock cannot access streams for drinking water. Considers that a farm-scale approach is appropriate, rather than blanket restrictions. Submitter also refers to comments regarding WH.P29.	Delete provision
S51.014	8 Whaitua Te Whanganui-a-Tara	Rule WH.R29: Livestock access to a small river - discretionary activity.	Oppose	Supports stream revegetation, however considers it costly and impractical within hilly landscapes. Notes potential for animal welfare issues if livestock cannot access streams for drinking water. Considers that a farm-scale approach is appropriate, rather than blanket restrictions. Submitter also refers to comments regarding WH.P28.	Delete provision

S109 Mark Phillips

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S109.001	4 Policies	Policy P70: Minimising effects of rural land use activities.	Amend	Considers that GWRC is selecting regenerating land with low stock units to control erosion rather than deforested plantation forestry blocks which is inconsistent with the Government's promotion of Pinus Radiatus. Considers that isolating erosion prone areas to stop stock movement will not prevent wild animals entering, and vegetated areas with no firebreaks are a fire risk that can damage waterways which flow into Pauatahanui Inlet. Queries whether land with one cow per 2+Ha or one family and associated infrastructure (driveway, sewage) to 2.5Ha is better for the environment. Considers that elimination should be the first option in controlling hazards, and that erodible areas should be removed down to the lowest river level of the property, to create a flat land with a gradual, controllable flow of water to Pauatahanui Inlet.	Amend plan change 1 erosion controls.

S230 Mary Beth Taylor

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S230.001	General comments	General comments - water quality improvements	Support	Supports the provisions and rules that will lead to better outcomes for freshwater quantity and quality in the region. Considers these make sense, are overdue, and should be implemented swiftly and decisively.	Not stated
S230.002	General comments	General comments - definitions	Amend	Considers GW should push for a better and more clear definition for 'Peatlands' under the RMA to work toward their protection and restoration. Considers the RAMSAR Convention should ideally be applied to the Mangaroa Peatland.	Not stated

S115 Mary Hutchinson

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S115.001	General comments	General comments - overall	Support	Supports PC1, particularly the whaitua process for Te Whanganui-a-Tara and Te Awarua-o-Porirua. Considers that PC1 should be integrated with the related functions and initiatives of other statutory authorities.	Retain PC1 as notified (inferred)
S115.002	General comments	General comments - consultation	Support	Considers PC1 requires effective community engagement and expressed disappointment with GWRC, Wellington Water and WCC community engagement as part of a previous project submitter was involved in. Supports Eugene Doyle's view (another submitter) that processes supporting community groups' participation in council and associated agencies' work needs to be improved.	Not stated
S115.003	8 Whaitua Te Whanganui-a-Tara	8.1 Objectives	Support	Requests interim milestones, supported by numerical objects and monitoring programmes are required to ensure actions implemented are effective.	Not stated
S115.004	8 Whaitua Te Whanganui-a-Tara	Table 8.3 Primary contact site objectives in rivers.	Support	Supports numerical requirements for lakes and surface water, particularly the Hutt River catchment in Table 8.3. Supports human health/contact recreation being the standard where water bodies are used for that purpose	Not stated
S115.005	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Support	Supports Target attribute states for rivers in Table 8.4	Not stated
S115.006	8 Whaitua Te Whanganui-a-Tara	8.2 Policies	Support	Supports policies WH.P1 to WH.P33 and any associated target attribute states and flow requirements	Not stated
S115.007	8 Whaitua Te	8.3 Rules	Support	Supports Rules WH.R1 to WH.R36. Supports, where possible, water sensitive urban design	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara			requirements to minimise runoff intensity where hard surfacing is increased.	

S042 Maryanne Gill

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S42.001	General comments	General comments - overall	Oppose	Concerned the submitter's farm is in jeopardy from PC1 policies. Considers restrictions are excessive and go beyond GWRC's mandates to "clean up" waterways. Concerned legal battles will occur due to deprivation of property rights from PC1. Notes the stress and pressure on farmers is already disproportionately high.	Not stated.
S42.002	General comments	General comments - overall	Oppose	Considers the plan severely restricts farmers and farming practices and is the reason why so many people are continually "giving up " farming. Considers Makara is already an example of this. Concerned of difficultly to meet regulations relating to farming and land use. Concerned animals cant get water because of alleged "stream contamination.	Not stated.
S42.003	General comments	General comments - consultation	Oppose	Concerned with the communication to affected parties and considers there has been insufficient information regarding PC1.	Not stated.
S42.004	General comments	General comments - rural	Oppose	Stock exclusion from waterways: Considers there is no evidence for stock exclusion from waterways in the south Makara stream. Notes the submitter already voluntarily undertakes riparian planting and water tests, which show no results of e-coli or nitrogen leaching. Concerned GWRC will eventually change cattle exclusion to include sheep and horses which will affect the submitters Horse Park business, and that	Not stated.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				having to pipe water to over 30 paddocks would be uneconomical and against animal welfare codes. Concerns that strong enforcement of stock exclusion throughout Makara and Ohariu Valley has been recommended without sufficient evidence.	
S42.005	General comments	General comments - rural	Oppose	Silt contamination: Considers GWRC do not know the source of silt contamination, but blame farmers and exclude stock from water courses. Notes the makara river floods and considers silt falls off the sides of the streams during flooding. Considers riparian planting may help reduce the amount of silt, but nature cannot be stopped and rivers will always have silt contamination, but this is not caused by farming.	Not stated.
S42.006	General comments	General comments - rural	Oppose	Concerned with the models used relating to erosion prone land and considers local history proves erosion problems have not been an issue from farming this Region. Considers eroded soil is caused by feral goats and wild pigs from the Council owned Mountain bike park and cause more damage then grazing sheep and cattle. Considers GWRC should buy out/compensate all farmers/landowners for land retirement. Questions why native replanting is required, after it was compulsory to replace pine plantings with pines previously.	Not stated.
S42.007	General comments	General comments - rural	Oppose	Concerned with the limited areas which will be allowed to be grazed/used after PC1 due to the government direction on SNA areas and the "erosion prone" land identified in PC1 which must be retired or fenced and planted in natives and the lower slopes "stock grazing exclusion zones".	Not stated.
S42.008	General comments	General comments - overall	Oppose	Strongly opposes PC1 and the removal of community decision making. Agrees with the need to improve poor water quality where it is poor and where the solutions are within submitters control.	Recognise the work that submitter has done and partner and work with landowners rather than regulating against them.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers fundamental evidence is required to do this effectively and equitably. Requests GWRC to recognise the work that has been done and ask GWRC to partner and work with landowners rather than regulating against.	
S42.009	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Oppose	Considers the earthworks provisions in PC1 are complicated and impossible for a "lay person " to adhere or understand. Considers in order for farmers to protect their land and stock, they need access land at all times because stock welfare is dependent on it (especially during calving and lambing seasons). Concerned GWRC want to ban earthworks for 4 months of the year and considers this disregards farm safety, stock welfare and farm tracks access.	Not stated.

S214 Megan Persico

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S214.001	General comments	General comments - unplanned greenfield development	Oppose	Concerned the prohibition of greenfield developments fails to consider individual merits. Considers the emergence of decentralisation wastewater infrastructure will likely accelerate, reducing the potential environment impact from new subdivisions. Considers GWRC should consider greenfield developments individually on merits and impacts on the environment.	Review and amend to reflect the outcome of UHCC PC50 that was notified prior to PC1.
S214.002	General comments	General comments – current legislation	Not Stated	Considers PC1 should be put on hold due to signalled repeal of NPS-FM from the new government.	Put PC1 on hold.
S214.003	General comments	General comments - overall	Not Stated	Supports the "Maymorn Collective" submission.	Not Stated.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S214.004	6 Other methods	Method M42: Small farm property registration within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Oppose	Considers farms under 20 hectares is a hobby and livestock welfare falls under MPI not GWRC.	Amend so that small farm registration only applies to farms greater than 20 hectares.

S004 Melanie Rattray

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S4.001	General comments	General comments - water bodies	Support	Considers limiting herd sizes and protecting rivers is a basic first step.	Retain as notified (inferred)

S114 Michael Marfell-Jones

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S114.001	General comments	General comments - consultation	Oppose	Recommends withdrawal of PC1, due to concerns with lack of consultation with rural communities.	Withdraw PC1 in full

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S114.002	General comments	General comments - overall	Oppose	Questions the legality of the process undertaken by GWRC as "regulation by fiat", citing recent Environment Court decisions.	Delete provisions that have not been informed through consultation [inferred]
S114.003	General comments	General comments - overall	Oppose	Expressed concern that some rules have immediate legal effect when consultation or on-site inspections have taken place, and that this may result in unknown or retrospective non-compliances.	Remove requirements for all rules to have immediate legal effect. Insert text which states "all rules in this plan change will be held in abeyance pending the plan change passing through all stages required by the RMA."
S114.004	6 Other methods	Method M42: Small farm property registration within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Oppose	Does not support the prescribed information requirements, on the basis that it is too complex for laypeople to record.	Delete the requirement for farms of 4 ha to register with GWRC.

S029 Neil Deans

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S29.001	General comments	General comments - overall	Support	Supports GWRC's Whaitua process, and supports the implementation of the recommendations made by Whaitua members to address freshwater issues.	Not stated.
S29.002	General comments	General comments - water bodies	Support	The state of water bodies reflects the use of land, water and other resources in their catchments.	Not stated.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S29.003	General comments	General comments - water bodies	Support	Considers community values of many water bodies have been compromised but these streams and other water bodies continue to provide species' habitats. Considers collective action through the regional plan is required to secure and improve waterbodies and ensure they remain community assets.	Not stated.
S29.004	General comments	General comments - water bodies	Amend	Supports the direction of PC1 to require specific actions to improve water bodies over time. Recommends that interim and measurable milestones are set for achieving improved freshwater outcomes to ensure that measures are effective.	Not stated.
S29.005	5.4 Beds of lakes and rivers	5.4.8 Damming and diverting water	Amend	Considers issues around fish passage are not addressed (Rule R151A). Seeks for discretion to be available to require fish passage for activities which have existed for 10 years or more, where practical.	Enable discretion to require fish passage where practical.
S29.006	6 Other methods	6.16 Freshwater Action Plan programme	Support	No relevant comments	Retain as notified
S29.007	6 Other methods	Method M43: Supporting the health of urban waterbodies.	Support	Supports the health of, and funding for, urban waterbodies. Notes the benefit of endorsement by local authorities in existing and new development.	Not stated.
S29.008	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Support	Not stated	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S29.009	6 Other methods	Method M45: Funding of wastewater and stormwater network upgrades	Support	Supports Methods M43 and M44 and suggests this would also benefit from active endorsement by territorial local authorities in the development of existing and new urban development.	Not stated.
S29.010	8 Whaitua Te Whanganui-a-Tara	8.1 Objectives	Support	Supports objectives WH.01-WH.09 however recommends interim milestones are set, supported by numerical objectives and monitoring programmes to meet desired outcomes.	Implement interim milestones supported by numerical objectives and monitoring programmes
S29.011	8 Whaitua Te Whanganui-a-Tara	Table 8.3 Primary contact site objectives in rivers.	Support	Supports numerical requirements for running waters in addition to those for lakes. Considers human health for contact recreation should be the standard where the water bodies are used for that purpose.	Human health for contact recreation be the standard where water bodies are used for that purpose
S29.012	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Support	Supports target attribute states	Retain as notified
S29.013	8 Whaitua Te Whanganui-a-Tara	8.2 Policies	Support	Supports policies WH.P1-P.33 including the associated target attribute states and flow requirements.	Retain as notified
S29.014	8 Whaitua Te Whanganui-a-Tara	8.3 Rules	Support	Supports Rules WH.R1 to WH.R36 and notes wherever possible, water sensitive urban design should be required to minimise increased runoff intensity due to increasing hard surfaces.	Include requirement for WSUD in Rules WH.R1-WH.R36 where possible
S29.015	9 Te Awarua-o-Porirua Whaitua	9.1 Objectives	Support	Supports the provisions of Chapter 9	Retain as notified

S227 New Zealand Agrichemical Education Trust (NZAET)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S227.001	5.1 Air quality rules	General conditions for the discharge of agrichemicals.	Amend	Notes only agrichemicals with hazardous properties are approved by the EPA and this rule effectively makes non-hazardous agrichemicals not permitted in the region. Notes that non-hazardous substances are already covered under the HSNO Act and associated EPA notices.	Delete "(d) the **agrichemical** is approved by the Environmental Protection Agency"
S227.002	5.1 Air quality rules	General conditions for the discharge of agrichemicals.	Amend	Notes that 5.1.13 (e) requires the user to follow the label but there are multiple situations where users of agrichemicals may not follow the label including crops where the product has not been formally approved. Considers it is reasonable to limit the application to the label requirements for domestic users of agrichemicals.	Move clause (e) to amended R37 to make it a requirement for domestic users of agrichemicals only. Add an equivalent statement to R38 - see separate submission point.
S227.003	5.1 Air quality rules	Rule R37: Handheld discharge of agrichemicals - permitted activity.	Amend	Considers that handheld application on commercial/public properties should be subject to greater oversight than proposed. Notes handheld application is not covered by requirements of R38(F) R38(G) and so no spray plan or notification is required.	Rename R37 to Handheld discharge of agrichemicals on a residential property
S227.004	5.1 Air quality rules	5.1.13 Discharge of agrichemicals.	Amend	Considers that requiring exact compliance with label conditions is restrictive for commercial agrichemical users. Notes the New Zealand Standard for the Management of Agrichemicals, and that requirements have, through the Standards NZ process, been confirmed as reasonable minimum requirements for agrichemical use in workplaces but they retain flexibility for off-label use where it is appropriate.	Replace 5.1.13 (e) with the following and move out of General Conditions and into R38: the discharge shall be undertaken in accordance with the good practice requirements set out in NZS 8409:2021 Section 5.2.

S227.005	5.1 Air quality rules	Rule R38: Motorised and aerial discharge of agrichemicals - permitted activity.	Amend	Considers notification requirements are too vague except for public spraying (g) and that appendix G3 requirements balances applicators and neighbour's needs. Suggests the deletion of R38(g) as Appendix G3 and G4 covers this content.	Amend R38(e)(ii) to reference NZS 8409: 2021 Appendix G3
S227.006	5.1 Air quality rules	Rule R38: Motorised and aerial discharge of agrichemicals - permitted activity.	Amend	Considers if R37 is renamed to cover residential handheld application of agrichemicals, this rule must be extended to cover handheld application in non-residential application sites.	Amend name of Rule to All other agrichemical application

S263 New Zealand Carbon Farming Group (NZCF)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S263.001	General comments	General comments - overall	Oppose	Notes that the purpose of PC1 is to give effect to NPSFM in two of the five whaitua of the Wellington region and implement regulatory and some of the non-regulatory recommendations from Whaitua Te Whanganui-a-Tara Implementation Programme ("TWT WIP") and Te Awarua-o-Porirua Implementation Programme ("Top WIP"), including by implementing the National Objectives Framework ("NOF") within Te Awarua-o-Porirua and Te Whanganui-a-Tara whaitua. Notes the Section 32 Report concludes the outcome sought by PC1 is the reduction of sediment in the rivers in Te Awarua-o-Porirua and Te Whanganui-a-Tara. The Section 32 Report concludes that: • plantation forestry has associated land disturbance	1. That the provisions of the Proposed Plan Change that regulate commercial forestry, including those provisions that are intended to prevail over the NESPF, are withdrawn (or the Proposed Plan Change is not included in the NRP) until such time as: - the efficiency and effectiveness of the NESCF has been monitored and the results of such monitoring support the need for provisions in the NRP that prevail over the NESCF; - the scope of the Proposed Plan Change clarified, including in respect of permanent forests, or commercial forests planted for carbon sequestration purposes; - decisions on submissions on Proposed Change 1 to the WRPS have been made; - the recommendations in the Te Whaitua te Whanganui-a-Tara Implementation Programme 2021 accurately and appropriately reflected in Proposed Plan Change provisions;

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				and discharges of sediment; • forestry is a major land use in the Te Awarua-o-Porirua and Te Whanganui-a-Tara whaitua (13.5% and 8% respectively); • much of this forestry is located on steep land in the higher elevation areas; • harvesting of the forests occurs and will continue to occur; • therefore, to control sediment and meet outcomes, a combination of regulation of land uses and discharges will be required (including the avoidance of soil disturbance associated with plantation forestry on land with high risk of erosion, incentives and rules to permanently revegetate high risk erosion land). Submitter accepts that some forestry related activities have adverse effects (including in respect of the discharge of sediment), but considers PC1 documentation does not provide sufficient evidence, or technical data to support proposed regulatory response. Considers that the regulatory response included in the PC1, being the avoidance of land disturbance, is disproportionate to outcome sought by PC1, being reduction of sediment in rivers.	- a fulsome evaluation of the provisions is undertaken in a manner consistent with section 32 of the RMA, with the outcome of that evaluation confirming the necessity of the Proposed Plan Change; and an evaluation is completed under section 32(4) of the RMA, that explicitly evaluates the relevant provisions of the Proposed Plan Change relative to the NESPF, with the outcome of that evaluation confirming the necessity of provisions that prevail over the NESPF. 2. Should the relevant provisions of the Proposed Plan Change not be withdrawn (or the Proposed Plan Change is included in the NRP), NZCF seeks that the Proposed Plan Change is amended to make all required changes, including the specific amendments set out in Table at Appendix A. It is noted that the relief in Appendix A is only sought should NZCF's primary relief (being the withdrawal of the Proposed Plan Change or the Proposed Plan Change not being include in the NRP) not be accepted. 3. Such further, alternative or consequential relief as may be necessary to fully give effect to this submission. 4. Consistent with the Implementation Plans' recommendations, NZCF is available and willing to work collaboratively with GWRC, including through the sharing of information in respect of commercial forestry and the implementation of the NESCF, to further develop practice and any necessary regulatory intervention to address the adverse effects of discharges from commercial forestry activities on water quality.
S263.002	General comments	General comments - fresh water	Oppose	Notes majority of PC1 provisions subject to this submission form part of a freshwater planning instrument. Notes the Section 32 Report provides the following justification in 'Table A1: Analysis of PC1 provisions, including definitions, schedules, and maps, to identify the freshwater planning instrument' in respect of the forestry related provisions: "These policies, rules, method and supporting definitions, schedules and maps focus on the management of rural land use activities, forestry,	1. That the provisions of the Proposed Plan Change that regulate commercial forestry, including those provisions that are intended to prevail over the NESPF, are withdrawn (or the Proposed Plan Change is not included in the NRP) until such time as: - the efficiency and effectiveness of the NESCF has been monitored and the results of such monitoring support the need for provisions in the NRP that prevail over the NESCF; - the scope of the Proposed Plan Change clarified, including in respect of permanent forests, or commercial forests planted for carbon sequestration purposes;

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				and vegetation clearance. These provisions seek to manage the use of land to achieve freshwater outcomes. They relate to objectives that give effect to the NPS-FM." Given the stated primary intent of the provisions is to manage a land use activity, considers PC1 draws a longbow in determining scope of the freshwater planning instrument. Concerned using a freshwater planning instrument to address land use activities inappropriately affects (inferred) the procedural rights of the submitter. Notes PC1 including the Section 32 Report, does not explicitly identify the Objective that gives rise to the provisions being a freshwater planning instrument.	- decisions on submissions on Proposed Change 1 to the WRPS have been made; - the recommendations in the Te Whaitua te Whanganui-a-Tara Implementation Programme 2021 accurately and appropriately reflected in Proposed Plan Change provisions; - a fulsome evaluation of the provisions is undertaken in a manner consistent with section 32 of the RMA, with the outcome of that evaluation confirming the necessity of the Proposed Plan Change; and an evaluation is completed under section 32(4) of the RMA, that explicitly evaluates the relevant provisions of the Proposed Plan Change relative to the NESPF, with the outcome of that evaluation confirming the necessity of provisions that prevail over the NESPF. 2. Should the relevant provisions of the Proposed Plan Change not be withdrawn (or the Proposed Plan Change is included in the NRP), NZCF seeks that the Proposed Plan Change is amended to make all required changes, including the specific amendments set out in Table at Appendix A. It is noted that the relief in Appendix A is only sought should NZCF's primary relief (being the withdrawal of the Proposed Plan Change or the Proposed Plan Change not being include in the NRP) not be accepted. 3. Such further, alternative or consequential relief as may be necessary to fully give effect to this submission. 4. Consistent with the Implementation Plans' recommendations, NZCF is available and willing to work collaboratively with GWRC, including through the sharing of information in respect of commercial forestry and the implementation of the NESCF, to further develop practice and any necessary regulatory intervention to address the adverse effects of discharges from commercial forestry activities on water quality.
S263.003	General comments	General comments - definitions	Oppose	Notes 'Production forestry' is defined in NRP with reference to the NES-PF meaning permanent forests, such as commercial forests for carbon sequestration purposes, are not managed by provisions of PC1.	1. That the provisions of the Proposed Plan Change that regulate commercial forestry, including those provisions that are intended to prevail over the NESPF, are withdrawn (or the Proposed Plan Change is not included in the NRP) until such time as: - the efficiency and effectiveness of the NESCF has been

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Notes Section 32 Report includes the following statement suggesting the scope of PC1 expands as the NES-CF is addressed through submissions and decision-making: "In these FMUs, plantation forest management is currently only subject to the regulations of the NES-PF, that came into force on 1 May 2018. From 03 November 2023, the NES-PF will be replaced by the Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2023 (NES-CF). The NES-CF extends the NES-PF to cover carbon forests as well as plantation forests, so the Plan Change 1 provisions applying to forestry are expected to remain appropriate with respect to the NES-CF, with some amendments to terminology. As the NES-CF will not be in effect at the date of notification of Plan Change 1, any amendments will be managed through the submissions and decision-making process." Considers that whilst submission and decision-making processes can address alignment of PC1 provisions with the NESCF, submissions and decision-making cannot be used to expand scope of PC1 to also address 'carbon forests'. Considers management of discharges from 'carbon forests', or 'carbon forests' more generally, is outside the scope of PC1.	monitored and the results of such monitoring support the need for provisions in the NRP that prevail over the NESCF; - the scope of the Proposed Plan Change clarified, including in respect of permanent forests, or commercial forests planted for carbon sequestration purposes; - decisions on submissions on Proposed Change 1 to the WRPS have been made; - the recommendations in the Te Whaitua te Whanganui-a-Tara Implementation Programme 2021 accurately and appropriately reflected in Proposed Plan Change provisions; - a fulsome evaluation of the provisions is undertaken in a manner consistent with section 32 of the RMA, with the outcome of that evaluation confirming the necessity of the Proposed Plan Change; and an evaluation is completed under section 32(4) of the RMA, that explicitly evaluates the relevant provisions of the Proposed Plan Change relative to the NESPF, with the outcome of that evaluation confirming the necessity of provisions that prevail over the NESPF. 2. Should the relevant provisions of the Proposed Plan Change not be withdrawn (or the Proposed Plan Change is included in the NRP), NZCF seeks that the Proposed Plan Change is amended to make all required changes, including the specific amendments set out in Table at Appendix A. It is noted that the relief in Appendix A is only sought should NZCF's primary relief (being the withdrawal of the Proposed Plan Change or the Proposed Plan Change not being include in the NRP) not be accepted. 3. Such further, alternative or consequential relief as may be necessary to fully give effect to this submission. 4. Consistent with the Implementation Plans' recommendations, NZCF is available and willing to work collaboratively with GWRC, including through the sharing of information in respect of commercial forestry and the implementation of the NESCF, to further develop practice and any necessary regulatory intervention to address the adverse effects of discharges from commercial forestry activities on water quality.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S263.004	General comments	General comments – plantation forestry	Oppose	Notes that PC1 acknowledges the NESCF came into force on 3 November 2023, but does not give explicit consideration to whether NESCF (and particularly amendments that strengthen the approaches to the management of adverse effects of forestry related activities) are able to achieve the stated outcome of PC1, being the reduction of sediment in rivers in the two Whāita's (inferred) Notes the NESCF is a national direction planning instrument and secondary legislation made under sections 43, 43A and 44 of the RMA. Noting the purpose and role in the hierarchy of RMA planning instruments, submitter considers it is important for Council to allow the NESCF to be appropriately implemented (including required monitoring). Considers it is premature for Council to promulgate a plan change to regulate production forest activities when new regulations have been made. Seeks PC1 is withdrawn (or the Proposed Plan Change is not included in the NRP) until such time as the efficiency and effectiveness of NESCF has been monitored and results of such monitoring support the need for provisions in NRP.	Seeks PC1 be withdrawn (or the Proposed Plan Change is not included in the NRP) until such time as the efficiency and effectiveness of NESCF has been monitored and results of such monitoring support the need for provisions in NRP
S263.005	General comments	General comments – plantation forestry	Oppose	Submitter understands PC1 prevails over those regulations in NESPF listed in the 'Note' that accompanies the new Rules in Chapters 8 and 9. In terms of NESCF, the Section 32 Report states: "The National Environmental Standards for Commercial Forestry (NES-CF) will, from 03 November 2023, supersede the NES-PF. The NES-CF will regulate commercial forestry activities for both carbon and timber production (plantation) forests. Plan Change 1 will introduce new provisions for forestry for the management of best practice to reduce sediment from sites. It is not expected that the NES-CF will impact on the approach being taken to manage forestry in Plan Change 1, and the new provisions will prevail over NES-CF rules."	Seeks that PC1 is withdrawn (or the Proposed Plan Change is not included in the NRP).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Submitter considers this gives rise to an issue in respect of whether the PC1 provisions prevail over NESCF. Considers provisions of PC1 cannot prevail over NESCF because this was not included in PC1 as notified. Does not consider this confusion can be remedied by simply replacing the acronym 'NESPF' with 'NESCF' without scope of PC1 being called into question.	
S263.006	General comments	General comments - overall	Oppose	Submitter notes Proposed Plan Change 1 WRPS is to give effect to the NPSFM and is therefore a freshwater planning instrument (in part). Notes that submissions on Proposed Change 1 are currently being heard and the final form of the WRPS (incorporating decisions on Proposed Change 1) is not known. Considers PC1 is also a freshwater planning instrument that is to give effect to the NPSFM. Considers it can be concluded that the final form of provisions in the WRPS as a result of Plan Change 1 to the WRPS will be relevant, and need to be given effect to, in the NRP. Considers that, because content of the WRPS that gives effect to the NPSFM is yet to be determined, it is premature and inefficient to notify NRP provisions that are also to give effect to the NPSFM.	Seeks that PC1 is withdrawn (or the Proposed Plan Change is not included in the NRP).
S263.007	General comments	General comments – plantation forestry	Oppose	Acknowledges Te Whaitua te Whanganui-a-Tara Implementation Programme addresses plantation forestry as follows: "Plantation forestry can have benefits for water quality, but it also brings a high risk of sediment loss in the years after harvesting, particularly in the headwaters of Te Awa Kairangi/Hutt River. Unfortunately, the evidence we have heard suggests that good-practice sediment management in line with national rules is not yet being consistently used. This suggests a need to ramp up	Seeks PC1 be withdrawn (or the Proposed Plan Change is not included in the NRP) and redrafted to reflect recommendations in the Implementation Plan.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				investigations of, and prosecutions for, poor management with greater accountability to communities affected by the consequences of poor practice." In response, the Implementation Programme includes the following recommendation: "SUPPORTING BEST PRACTICE AND COMPLIANCE OF FORESTRY OPERATIONS Greater Wellington provides enough staff and resources to: - Work with forestry groups (New Zealand Farm Forestry Association, New Zealand Forest Owners Association) and contractors to provide proactive advisory support that includes ensuring all forestry operators are aware (by 2023) of relevant regulatory requirements and good practice - Ensure all forestry operators in the whaitua are monitored for compliance with NES-PF and other relevant requirements from 2023 onwards, and share this monitoring information with the community - Take enforcement action on non-compliance. Submitter considers that while purported to implement the recommendations in the Implementation Plan, PC1 does not resemble the recommendations. In this regard, the Implementation Plan relies on NESPF, whereas PC1 seeks to override it. Also notes, PC1 fails to acknowledge benefits for water quality from plantation forestry that have been identified in the Implementation Plan.	
S263.008	General comments	General comments - plantation forestry	Oppose	Acknowledges the Te Awarua-o-Porirua Whaitua Implementation Programme 2019 concludes as follows: "Earthworks and forestry operations, if undertaken correctly and on suitable land, should result in	Seeks PC1 be withdrawn (or the Proposed Plan Change is not included in the NRP) and redrafted to reflect recommendations in the Implementation Plan.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				minimal (if any) discharges of sediment to the streams and harbour. The challenge is to ensure all earthworks and forestry operations are undertaken on suitable land and using good practice and the risks of sediment-laden water running off-site is minimised." Notes the Implementation Programme includes a specific section that addresses forestry - refer to Section 10.3 Forestry and recommendations 54-57. Notes that while purported to implement the recommendations in the Implementation Plan, the PC1 does not resemble the recommendations. Considers Implementation Plan also relies on NESPF and explicitly acknowledges time should be allowed for NESPF to be implemented. Notes as per the Te Whaitua te Whanganui-a-Tara Implementation Programme, PC1 fails to respond to recommendations that emphasise engagement and monitoring. Submitter agrees the NESPF, and now the NESCF, should be given time to 'bed-in' before more stringent provisions are included in the NRP.	
S263.009	General comments	General comments – plantation forestry	Oppose	Notes despite direction given in section 66 of RMA, PC1, including accompanying supporting documentation is silent on implications in respect of New Zealand's climate change response, and the contribution forestry makes to this response. That is: - PC1 has not given any consideration to Emissions Trading Scheme, which is established and comprehensively managed under Climate Change Response Act 2002, including obligations and liabilities therein. For instance, the liability and costs for deforestation. - PC1 is directly contrary to New Zealand's Emissions Reduction Plan (made in accordance with section 5ZI of the Climate Change Response Act 2002). The Emissions Reduction Plan includes an entire chapter (Chapter 14) that addresses	Seeks PC1 be withdrawn (or not included in the NRP)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				forestry. Notes chapter identifies the following 'key actions' to support the role of forestry in meeting New Zealand's 2050 targets: "Support afforestation by: - considering amendments to the New Zealand Emissions Trading Scheme (NZ ETS) and resource management settings to achieve the right type and scale of forests, in the right place - supporting landowners and others to undertake afforestation, particularly for erodible land - providing advisory services to land users, councils, Māori and other stakeholders to support choices for sustainable afforestation. Encourage native forests as long-term carbon sinks through reducing costs and improving incentives. Maintain existing forests by exploring options to reduce deforestation and encourage forest management practices that increase carbon stocks in pre-1990 forests. Grow the forestry and wood processing industry to deliver more value from low-carbon products, while delivering jobs for communities." - PC1 is not consistent with New Zealand's National Adaptation Plan (made in accordance with section 5ZI of the Climate Change Response Act 2002) and does not consider implications of Actions 3.13 and 6.12.	
S263.010	General comments	General comments – plantation forestry	Oppose	Submitter considers that the Section 32 Report: - fails to clearly identify Objective, or Objectives, the provisions of PC1 are to achieve and therefore does not support a conclusion that provisions are most appropriate; - does not include any evidence to support conclusions in respect of extent to which sediment in streams is reduced by various options that are evaluated; - fails to consider potential for sediment losses from	Seeks PC1 be withdrawn (or not included in the NRP)

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				land uses other than forestry, that is, potential for sediment losses to be greater where land is put to alternative uses; - does not address New Zealand's Emissions Reduction Plan (made in accordance with section 5ZI of the Climate Change Response Act 2002) as required by section 66 of the RMA and particularly does not consider contribution forestry makes to achieving New Zealand's emissions reduction target; - does not address New Zealand's National Adaptation Plan (made in accordance with section 5ZI of the Climate Change Response Act 2002) as required by section 66 of the RMA and particularly does not consider 'Action 6.12: Implement the Sustainable Land Management Hill Country Erosion Programme' and acknowledgement that afforestation can reduce soil loss; - does not consider efficiency or costs in respect of practical implications of Maps 92 and 95, that is, the cost of areas where forestry is prohibited by virtue of the maps causing the ability to use neighbouring land for forest to be prevented or constraint through ownership, scale, access and economic constraints; - fails to describe or set out the social costs of the various options that have been evaluated; - does not quantify the costs of the various options, including in respect of employment and the New Zealand Emissions Trading Scheme; and - does not provide any evidence or data to support the conclusion the environment is degraded as a result of the status quo, including the NESPF, and the existing policy framework is unsuccessful at achieving outcomes set by objectives in NRP, Implementation Plans or national instruments. Considers PC1 is flawed because the evaluation required under section 32(4) has not been completed or documented in the Section 32 Report.	

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				Considers the Section 32 Report is inadequate and fails to confirm the provisions are the most appropriate, efficient of effective means to achieve Objectives or give effect to higher order planning instruments.	
S263.011	2 Interpretation	Afforestation	Support	Does not oppose inclusion of a definition of 'Afforestation' in the NRP as the term should be consistently understood where it is used in the provisions of the NRP. Notes proposed definition refers to the NESPF 2017 and does not address establishment of permanent forests, including commercial forests for carbon sequestration purposes.	Retain 'Afforestation' definition as notified.
S263.012	2 Interpretation	Earthworks	Support	Does not oppose inclusion of a definition of 'Earthworks' in NRP and notes the definition appropriately replicates the definition required by the National Planning Standards for most activities. With regards to the definition that applies to Rules WH.R20, WH.R21, P.R19 and P.R20, submitter notes that the proposed definition refers to NESPF 2017 and therefore the exception in the definition does not apply to earthworks for the establishment of permanent forests, including commercial forests for carbon sequestration purposes.	Retain 'Earthworks' definition as notified.
S263.013	2 Interpretation	Erosion and sediment management plan	Amend	Subject to relief sought in this submission, submitter is unsure whether a definition of 'Erosion and sediment management plan' is necessary for implementation of NRP. Submitter does not oppose definition.	Retain definition of 'Erosion and sediment management plan' as notified where the definition is necessary to assist the implementation of NRP.
S263.014	2 Interpretation	Harvesting	Support	Does not oppose inclusion of a definition for 'Harvesting' in NRP as the term should be consistently understood where it is used in provisions of NRP. Notes the proposed definition refers to NESPF 2017 and as such does not address the establishment of permanent forests, including commercial forests for carbon sequestration purposes.	Retain definition of 'Harvesting' as notified.

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S263.015	2 Interpretation	Highest erosion risk land (plantation forestry)	Oppose	Submitter opposes proposed Maps 92 and 95 in their entirety. Does not consider the definition of 'Highest erosion risk land (plantation forestry)' is necessary or appropriate.	Delete definition of 'Highest erosion risk land (plantation forestry)' in its entirety.
S263.016	2 Interpretation	Mechanical land preparation	Support	Does not oppose inclusion of a definition for 'Mechanical land preparation' in NRP as the term should be consistently understood where it is used in provisions of NRP. Notes the proposed definition refers to NESPF 2017 and as such does not address the establishment of permanent forests, including commercial forests for carbon sequestration purposes.	Retain definition of 'Mechanical land preparation' as notified.
S263.017	2 Interpretation	Registered forestry adviser	Amend	Does not oppose the definition of 'Registered forestry adviser' subject to relief sought in this submission. Considers the definition inappropriately narrows advice that may be given by a person registered under the Forests (Registration of Log Traders and Forest Advisers) Amendment Act 2020. That is, section 63M of the Forests (Registration of Log Traders and Forest Advisers) Amendment Act 2020 includes a more fulsome list of matters on which advice may be given. Notes that no rationale for narrowing these matters in the proposed definition is given in the Section 32 Report. Considers to extent that a definition is necessary, the definition should include all matters in Section 63M and seeks that definition is amended accordingly.	Amend definition of 'Registered forestry adviser' as follows: "Means a person registered under s63Q or s63T of Forests (Regulation of Log Traders and Forestry Advisers) Amendment Act 2020 that is authorised to **provide a forestry advice service defined by s63M of the Forests (Regulation of Log Traders and Forestry Advisers) Amendment Act 2020.** ~~give advice that relates to:~~ ~~(a) the establishment, management, or protection of a forest, and~~ ~~(b) the management or protection of land used, or intended to be used, for any purpose in connection with a forest or proposed forest, including biophysical and land use topics described in Ministry for Primary Industries, 2023, Guidance: What is a forestry adviser?, and~~ ~~(c) the beneficial effects of forests, including how they contribute to environmental outcomes."~~
S263.018	2 Interpretation	Replanting	Support	Does not oppose inclusion of a definition of 'Replanting' in NRP as term should be consistently understood where it is used in provisions of NRP, . Notes the proposed definition refers to NESPF 2017 and as such does not address establishment of permanent forests, including commercial forests for carbon sequestration purposes.	Retain definition of 'Replanting' as notified.

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S263.019	2 Interpretation	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)	Support	Submitter does not oppose inclusion of a definition of 'Replanting' in NRP as term should be consistently understood where it is used in provisions of NRP. Notes the proposed definition refers to NESPF 2017 and as such does not address establishment of permanent forests, including commercial forests for carbon sequestration purposes.	Retain definition of 'Vegetation clearance' as notified.
S263.020	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Oppose	Submitter opposes Policy WH.P28. More specifically, in terms of clause (a), submitter seeks the clause is deleted because: -the rationale for, and appropriateness of, the approach to the identification of highest erosion risk land (plantation forestry) is not clearly set out; -the rationale for departing from the erosion susceptibility classification in the NESPF is not set out in the manner required by section 32(4); -The practical implications of the mapping and associated provisions have not been considered, including the extent to which the mapped areas result in greater constraints because matters such as scale, ownership and topography may result in larger areas no longer being viable for forestry uses. In terms of clause (b), NZCF notes that planning and implementing erosion and sediment control is a normal part of forest operations. The NESPF includes requirement to manage erosion and sediment in any case. These Regulations have been updated in the NESCF. NZCF seeks limited amendments to clause (b) to reflect current best practice. NZCF does not support clause (c) of the Policy because preventing establishment of plantation forestry, or the continuation of plantation forestry, in identified areas:	Amend Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry "Reduce discharges of sediment from plantation forestry by: (a) ~~identifying highest erosion risk land (plantation forestry), and~~ ~~(b) improving management of plantation forestry~~ by requiring erosion and sediment management plans to be prepared and complied with, ~~and~~ ~~(c) requiring that on highest erosion risk land (plantation forestry), plantation forestry is not established or continued beyond the harvest of existing plantation forest."~~

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				-is not supported by evidence and may not result in the outcome sought, being reduced sediment in rivers; -is not necessary or appropriate to give effect to any provision of a higher order planning instrument; -is inconsistent with the recommendations in the Te Whaitua te Whanganui-a-Tara Implementation Programme and the Te Awarua-o-Porirua Whaitua: Whaitua Implementation Programme; and -is contrary to the New Zealand's Emissions Reduction Plan and New Zealand's National Adaptation Plan.	
S263.021	8 Whaitua Te Whanganui-a-Tara	8.3.4 Land uses	Oppose	Notwithstanding the primary relief sought, submitter notes the 'Note' that immediately precedes Rule WH-R20 in PC1 appears to refer to Regulations of the NES-FW in error. If this is the case, subject to matters raised elsewhere in this submission, submitter seeks the 'Note' be amended to reference NESPF 2017.	Amend the Note that precedes Rule WH-R20 as follows: "Note Rules WH.R20, WH.R21 and WH.R22 prevail over the following Regulations of the Resource Management (National Environmental Standards for ~~Freshwater~~ **Production Forestry)** Regulations 202~~0~~**17:** Part 2 Regulation of plantation forestry activities Subpart 1--Afforestation Regulations 9(2), 10, 14(3), 15(5), 16(2), 17(1), 17(3), and 17(4) Subpart 3--Earthworks Regulations 24 to 35 Subpart 6--Harvesting Regulation 64(1) and (2), as far as these apply to a Regional Council Regulations 63(2) and (3), 64(3), 65 to 69, 70(3) and (4), and 71 Subpart 7--Mechanical land preparation Regulations 73(2), 74, and 75 Subpart 8--Replanting Regulations 77(2), 78(2) and (3), 80, and 81(3) and (4) Subpart 9--Ancillary activities Regulations 89 and 90 Regulation 95, as far as this applies to a Regional Council Subpart 10--General provisions (including discharges of

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					sediment) Regulation 97(1)(a), (b), (c), (f) and (g)."
S263.022	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Oppose	Notwithstanding primary relief sought, submitter considers the Section 32 Report does not establish that controlled activity status is necessary or appropriate where standards in the proposed Rule are met. Notes the purpose of PC1 is to reduce sediment in rivers and complying with 'standards' will achieve this such that the need for a resource consent to confirm compliance is unnecessarily onerous. Submitter considers the proposed Rule goes beyond management of discharges by managing activities more generally despite not always being a direct causal relationship and without consideration of methods that do not result in discharges. Does not support 'standard' in clause (d) because: - frequency of Council monitoring is not sufficiently certain, that is, considers the standard could inappropriate result in a circumstance where, if an exceedance is detected, and then Council does not undertake further monitoring for some time, a more stringent activity status applies (for want of further monitoring by a third party); -it is not appropriate for a more stringent activity status to apply in circumstances where activities of third parties in catchment cause an exceedance, rather it is more appropriate to establish standards for discharges at source and confine standards to matters the party undertaking the activity can control.	Amend Rule WH.R20 as follows: "WH.R20: Plantation forestry - **permitted** ~~controlled~~ activity**The discharge of sediment to a surface waterbody associated with a**~~A~~fforestation, harvesting, earthworks, vegetation clearance or mechanical land preparation for plantation forestry, ~~and any associated discharge of sediment to a surface water body,~~ is a **permitted** ~~controlled~~ activity providing the following conditions are met: (a) the land is not high erosion risk land (pasture) or highest erosion risk land (pasture) that was in pasture or scrub on 30 October 2023, and (b) an erosion and sediment management plan has been prepared in accordance with Schedule 34 (forestry plan), certified by a registered forestry adviser and submitted with the application for resource consent under this rule, and (c) the concentration of total suspended solids in the discharge from the plantation forestry shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, ~~and~~ ~~(d) the most recent Wellington Regional Council monitoring record demonstrates that the measure of visual clarity for the relevant catchment does not exceed the target attribute state at any monitoring site within the relevant part Freshwater Management Unit set out in Table 8.4.~~ ~~Matters of control~~ ~~1. The content of the erosion and sediment management~~

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					~~plan, including the actions, management practices and mitigation measures necessary to ensure that discharge of sediment will be minimised, and will not increase the average annual sediment load for the part Freshwater Management Unit in which the plantation forestry is located~~ ~~2. The area, location and methods employed in the plantation forestry~~ ~~3. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent (including auditing of information) to demonstrate and/or monitor compliance with the resource consent and the erosion and sediment management plan~~ ~~4. The timing, frequency and requirements for review, audit and amendment of the erosion and sediment management plan."~~
S263.023	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry - discretionary activity.	Amend	Submitter notes the purpose of PC1 is to reduce sediment in rivers. Submitter considers the proposed Rule goes beyond management of discharges by managing activities more generally despite not always being a direct causal relationship and without consideration of methods that do not result in discharges. Seeks rule is amended to directly relate to purpose of PC1. Submitter is of the view that potential adverse effects of a discharge of sediment to a river, are sufficiently known and confined such that restricted discretionary activity status is the most appropriate activity status to apply in circumstances where standards in Rule WH.R20 are not met. Suggests the 'matters of control' in Rule WH.R20 are appropriate to apply as 'matters of discretion'.	Amend Rule WH.R21 as follows: "Rule WH.R21: Plantation forestry - **restricted** discretionary activity **The discharge of sediment to a surface water body associated with a**~~A~~fforestation, harvesting, earthworks, vegetation clearance or mechanical land preparation for plantation forestry ~~and any associated discharge of sediment to a surface water body~~ that does not comply with one or more of the conditions of Rule WH.R20 ~~and is not a prohibited activity under Rule WH.R22~~ is a **restricted** discretionary activity.**Matters of discretion** **1. The content of the erosion and sediment management plan, including the actions, management practices and mitigation measures necessary to ensure that discharge of sediment will be minimised, and will not increase the average annual sediment load for the part Freshwater Management Unit in which the plantation forestry is located** **2. The area, location and methods employed in the plantation forestry** **3. The monitoring, record keeping, reporting and information provision requirements for the holder of the**

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					resource consent (including auditing of information) to demonstrate and/or monitor compliance with the resource consent and the erosion and sediment management plan 4. The timing, frequency and requirements for review, audit and amendment of the erosion and sediment management plan."
S263.024	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.	Oppose	Submitter opposes Rule in its entirety for the following reasons: Considers there is neither a strong evidential basis nor objectives and policies (including in the WRPS, the NRP and the Proposed Plan Change) to justify applying the most extreme stringent approach to plantation forestry in particular locations. With reference to Royal Forest & Bird Protection Society of New Zealand Inc v Whakatane District Council [2017] NZEnvC 51 at [62] the Environment Court noted, the complexity of plan making means the classification of activities is likely to require specific analysis of effects of that activity again the particular objectives and policies which relate to the activity being assessed. The Court also emphasised that: Submitter is not aware of any operative objective or policy that directs such a stringent outcome. Further, no analysis of the nature described has been completed or documented in this instance. Considers the Rule overly stringent in circumstances where activities addressed by the Rule can be undertaken in a way that does not result in sediment discharges to rivers. No consideration has been given to afforestation being undertake in a manner that does not result in discharges. Considers the Rule could result in an increase in discharges of sediment to rivers because, as	Delete Rule WH-R22 in its entirety, as follows:~~"Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity Afforestation, earthworks, or mechanical land preparation for plantation forestry on highest erosion risk land (plantation forestry) is a prohibited activity."~~

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				acknowledged Plan, continued use of the identified area for forestry is likely to reduce discharges over life of a forest to a greater extent than other uses of the land, including retirement. Considers applying prohibited activity status to one use of highest erosion risk land is not even-handed as other potential land uses are not similarly managed. A more even-handed rule would be more directly related to the potential adverse effects of activities. That is, prohibiting the effects of discharges to freshwater, rather than prohibiting an activity. Considers the purpose of the rule is to reduce sediment in rivers, yet the rule prevents an activity as a whole in an ill-defined area. Considers that no direct causal relationship has been established for the activity and area such that prohibited activity status is appropriate or necessary. Considers prohibited activity status is inconsistent with, and contrary to, recommendations of Te Whaitua te Whanganui-a-Tara Implementation Programme and Te Awarua-o-Porirua Whaitua: Whaitua Implementation Programme. Considers prohibited activity status is contrary to New Zealand's Emissions Reduction Plan and New Zealand's National Adaptation Plan.	
S263.025	9 Te Awarua-o-Porirua Whaitua	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Oppose	Submitter opposes Policy P.P26 for all of the reasons set out in this submission. More specifically, in terms of clause (a), the submitter seeks that the clause is deleted because: - the rationale for, and appropriateness of, approach to the identification of highest erosion risk land (plantation forestry) is not clearly set out; - the rationale for departing from the erosion susceptibility classification in the NESPF is not set out in manner required by section 32(4); - the practical implications of mapping and associated provisions have not been considered,	Amend Policy P.P26 as follows: "Policy P.P26: Achieving reductions in sediment discharges from plantation forestry Reduce discharges of sediment from plantation forestry by: (a) ~~identifying highest erosion risk land (plantation forestry), and (b) improving management of plantation forestry~~ by requiring erosion and sediment management plans to be prepared and complied with, ~~and~~ ~~(c) requiring that on highest erosion risk land (plantation~~

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				including extent to which the mapped areas result in greater constraints because matters such as scale, ownership and topography may result in larger areas no longer being viable for forestry uses. In terms of clause (b), submitter notes that planning and implementing erosion and sediment control is a normal part of forest operations. Notes the NESPF includes requirement to manage erosion and sediment in any case and these Regulations have been updated in the NESCF. Seeks limited amendments to clause (b) to reflect current best practice. Does not support clause (c) because preventing establishment of plantation forestry, or continuation of plantation forestry, in identified areas: - is not supported by evidence and may not result in outcome sought, being reduced sediment in rivers; - is not necessary or appropriate to give effect to any provision of a higher order planning instrument; - is inconsistent with recommendations in the Te Whaitua te Whanganui-a-Tara Implementation Programme and the Te Awarua-o-Porirua Whaitua: Whaitua Implementation Programme; and - is contrary to New Zealand's Emissions Reduction Plan and New Zealand's National Adaptation Plan.	~~forestry), plantation forestry is not established or continued beyond the harvest of existing plantation forest."~~
S263.026	9 Te Awarua-o-Porirua Whaitua	9.3.4 Land uses	Oppose	Notwithstanding primary relief sought, submitter notes the 'Note' that immediately precedes Rule P.R19 in PC1 appears to refer to Regulations of NES-FW in error. If this is the case, subject to matters raised elsewhere in this submission, submitter seeks the 'Note' be amended to reference NESPF 2017.	Amend the Note that precedes Rule P.R19 and follows: "Note Rules P.R19, P.R20 and P.R21 prevail over the following Regulations of the Resource Management (National Environmental Standards for ~~Freshwater~~ **Production Forestry**) Regulations 202~~0~~**17:** Part 2 Regulation of plantation forestry activities Subpart 1--Afforestation Regulations 9(2), 10, 14(3), 15(5), 16(2), 17(1), 17(3), and 17(4) Subpart 3--Earthworks Regulations 24 to 35

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					Subpart 6--Harvesting Regulation 64(1) and (2), as far as these apply to a Regional Council Regulations 63(2) and (3), 64(3), 65 to 69, 70(3) and (4), and 71 Subpart 7--Mechanical land preparation Regulations 73(2), 74, and 75 Subpart 8--Replanting Regulations 77(2), 78(2) and (3), 80, and 81(3) and (4) Subpart 9--Ancillary activities Regulations 89 and 90 Regulation 95, as far as this applies to a Regional Council Subpart 10--General provisions (including discharges of sediment) Regulation 97(1)(a), (b), (c), (f) and (g)."
S263.027	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry - controlled activity.	Oppose	Notwithstanding primary relief sought, submitter considers the Section 32 Report does not establish that controlled activity status is necessary or appropriate where standards in the Rule are met. Notes the purpose of PC1 is to reduce sediment in rivers and complying with 'standards' will achieve this such that the need for a resource consent to confirm compliance is unnecessarily onerous. Further, consistent with the purpose of PC1, submitter considers Rule goes beyond management of discharges by managing activities more generally despite there not always being a direct causal relationship and without consideration of methods that do not result in discharges. Seeks Rule is amended to directly relate to purpose of PC1. Does not support 'standard' in clause (d) because: - frequency of Council monitoring is not sufficiently certain. Considers the standard could inappropriate result in a circumstance where, if an exceedance is detected, and Council does not undertake further monitoring for some time, a more stringent activity status is applies (for want of further monitoring by a	Amend Rule P.R19 as follows: "Rule P.R19: Plantation forestry - **permitted** ~~controlled~~ activity The discharge of sediment to a waterbody associated with the use of land for afforestation, harvesting, earthworks, or mechanical land preparation for plantation forestry, ~~and any associated discharge of sediment to a surface water body, is a~~ **permitted** ~~controlled~~ activity providing the following conditions are met: (a) the land is not high erosion risk land (pasture) or highest erosion risk land (pasture) that was in pasture or scrub on 30 October 2023, and (b) an erosion and sediment management plan has been prepared in accordance with Schedule 34 (forestry plan), certified and submitted with the application for resource consent under this rule, and (c) the concentration of total suspended solids in the discharge from the plantation forestry shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing,

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				third party); - considers it not appropriate for a more stringent activity status to apply in circumstances where activities of third parties in catchment cause an exceedance, rather it is more appropriate to establish standards for discharges at source and confine standards to the matters the party undertaking the activity can control.	decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, ~~and~~ ~~(d) the most recent Council monitoring record demonstrates that the measure of visual clarity for the relevant catchment does not exceed the target attribute state at any monitoring site within the relevant part Freshwater Management Unit set out in Tables 9.1 and 9.2.~~ ~~Matters of control~~ ~~1. The content of the erosion and sediment management plan, including the actions, management practices and mitigation measures necessary to ensure that discharge of sediment will be minimised, and will not increase the average annual sediment load for the part Freshwater Management Unit in which the plantation forestry is located~~ ~~2. The area, location and methods employed in the plantation forestry~~ ~~3. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent (including auditing of information) to demonstrate and/or monitor compliance with the resource consent and the erosion and sediment management plan~~ ~~4. The timing, frequency and requirements for review, audit and amendment of the erosion and sediment management plan."~~
S263.028	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry - discretionary activity.	Oppose	Notwithstanding the primary relief sought, submitter notes purpose of PC1 is to reduce sediment in rivers. Considers Rule goes beyond management of discharges by managing activities more generally despite there not always being a direct causal relationship and without consideration of methods that do not result in discharges. Seeks Rule is amended to directly relate to purpose of PC1. Considers potential adverse effects of a discharge	Amend Rule P.R20 as follows: "Rule P.R20: Plantation forestry - **restricted** discretionary activity **The discharge of sediment to a surface waterbody associated with a**~~A~~fforestation, harvesting, earthworks, vegetation clearance or mechanical land preparation for plantation forestry ~~and any associated discharge of sediment to a surface water body~~ that does not comply with one or more of the conditions of Rule P.R19 is a **restricted**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				of sediment to a river, the considerations that are relevant to the adverse effect, are sufficiently known and confined such that restricted discretionary activity status is the most appropriate activity status to apply in circumstances where the standards in Rule P.R19 are not met. Submitter suggests the 'matters of control' in Rule P.R19 are appropriate to apply as 'matters of discretion'.	discretionary activity.**Matters of discretion** **1. The content of the erosion and sediment management plan, including the actions, management practices and mitigation measures necessary to ensure that discharge of sediment will be minimised, and will not increase the average annual sediment load for the part Freshwater Management Unit in which the plantation forestry is located** **2. The area, location and methods employed in the plantation forestry** **3. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent (including auditing of information) to demonstrate and/or monitor compliance with the resource consent and the erosion and sediment management plan** **4. The timing, frequency and requirements for review, audit and amendment of the erosion and sediment management plan."**
S263.029	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity.	Oppose	Notwithstanding primary relief, submitter opposes Rule P.R21 in its entirety for the following reasons: Submitter considers that there is neither a strong evidential basis nor objectives and policies (including in the WRPS, the NRP and the Proposed Plan Change) to justify applying the most extreme stringent approach (prohibited activity) to plantation forestry in particular locations. With reference to Royal Forest & Bird Protection Society of New Zealand Inc v Whakatane District Council [2017] NZEnvC 51 at [62] the Environment Court noted, the complexity of plan making means the classification of activities is likely to require specific analysis of effects of that activity again the particular objectives and policies which relate to the activity being assessed. Submitter is not aware of any operative objective or	Delete Rule P.R21 in its entirety as follows:~~"Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity Afforestation, earthworks, or mechanical land preparation for plantation forestry on highest erosion risk land (plantation forestry) is a prohibited activity."~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				policy that directs such a stringent outcome. Further, no analysis of the nature described has been completed or documented in this instance. Considers the Rule overly stringent in circumstances where activities addressed by the Rule can be undertaken in a way that does not result in sediment discharges to rivers. No consideration has been given to afforestation being undertake in a manner that does not result in discharges. Considers the Rule could result in an increase in discharges of sediment to rivers because, as acknowledged Plan, continued use of the identified area for forestry is likely to reduce discharges over life of a forest to a greater extent than other uses of the land, including retirement. Considers applying prohibited activity status to one use of highest erosion risk land is not even-handed as other potential land uses are not similarly managed. A more even-handed rule would be more directly related to the potential adverse effects of activities. That is, prohibiting the effects of discharges to freshwater, rather than prohibiting an activity. Considers the purpose of the rule is to reduce sediment in rivers, yet the rule prevents an activity as a whole in an ill-defined area. Considers that no direct causal relationship has been established for the activity and area such that prohibited activity status is appropriate or necessary. Considers prohibited activity status is inconsistent with, and contrary to, recommendations of Te Whaitua te Whanganui-a-Tara Implementation Programme and Te Awarua-o-Porirua Whaitua: Whaitua Implementation Programme. Considers prohibited activity status is contrary to New Zealand's Emissions Reduction Plan and New Zealand's National Adaptation Plan.	

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S263.030	12 Schedules	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	Amend	Does not support clause B of Schedule 34 because the clause: -is inappropriately expressed as a standard or rule and could be understood to be an absolute requirement; -in (4) appears to direct a single future use of the subject land and, in doing so, inappropriate erodes the ability for a landowner to make use of their property; -appears to have inappropriately (and without evidence) formed a view woody revegetation is the only means to reduce sediment discharges to water. Supports clause D to extent that ability to amend Erosion and Sediment Management Plan is provided. Considers providing ability to make amendments is necessary to respond effectively and efficiently to site requirements.	Amend Schedule 34 as follows: "A Purpose of the Erosion and Sediment Management Plan The purpose of an Erosion and Sediment Management Plan is: (a) to identify the risks of the loss of sediment from the plantation forestry **to waterbodies,** and (b) identify management practices and mitigation measures to address these risks. B Management objectives The Erosion and Sediment Management Plan must demonstrate that the measures adopted to address the identified risks **are designed to** ~~will:~~ 1. minimise sediment loss **to waterbodies** from activities in the plantation forest by adopting, as a minimum, good management practice, and 2. avoid an increase in risk of loss of sediment to water relative to the risk of loss that exists from the land in a natural state, and 3. achieve the discharge standard in Rule WH.R20(c) or Rule P.R19(c) for any discharge of water and sediment from plantation forestry into a surface water body, ~~and~~ ~~4. provide for plantation forestry on highest erosion risk land (Plantation forestry) to progressively reduce and cease beyond the next harvest. This land is to be restored and revegetated with appropriate permanent woody species.~~ ... D Amendment of Erosion and Sediment Management Plan Unless otherwise required by the Wellington Regional Council in accordance with any conditions of any resource consent held in respect of the plantation forest or property, changes can be made to the Erosion and Sediment Management Plan without triggering the need for a consent review or review by a registered forestry adviser provided: (a) the purpose of the Erosion and Sediment Management Plan will continue to be achieved, and (b) the change to the Erosion and Sediment Management Plan does not contravene any mandatory requirement of any

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					resource consent held in respect of the plantation forest or property, or any requirement of the Plan that is not already authorised, and (c) the nature of the change is documented in writing and made available to the Wellington Regional Council."
S263.031	13 Maps	Map 92: Highest erosion risk land (Plantation forestry) - Te Awarua-o-Porirua.	Oppose	Does not support mapping of highest erosion risk land (Plantation forestry) because: -the rationale for, and appropriateness of, the approach to the identification of highest erosion risk land (plantation forestry) is not clearly set out; -the rationale for departing from the erosion susceptibility classification in NESPF is not set out in the manner required by section 32(4); and -The practical implications of mapping and associated provisions have not been considered, including extent to which the mapped areas result in greater constraints because matters such as scale, ownership and topography may result in larger areas no longer being viable for forestry uses.	Delete Map 92 and replace with the erosion susceptibility classification in the NESPF throughout PC1.
S263.032	13 Maps	Map 95: Highest erosion risk land (Plantation forestry) - Te Whanganui-a-Tara.	Oppose	Does not support mapping of highest erosion risk land (Plantation forestry) because: -the rationale for, and appropriateness of, the approach to the identification of highest erosion risk land (plantation forestry) is not clearly set out; -the rationale for departing from the erosion susceptibility classification in NESPF is not set out in the manner required by section 32(4); and -The practical implications of mapping and associated provisions have not been considered, including extent to which the mapped areas result in greater constraints because matters such as scale, ownership and topography may result in larger areas no longer being viable for forestry uses.	Delete Map 95 and replace with the erosion susceptibility classification in the NESPF throughout PC1.

S195 New Zealand Farm Forestry Association (NZFFA)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S195.001	General comments	General comments - plantation forestry	~~Not Stated~~ Oppose	Considers PC1 is biased against forestry. Notes Council monitoring demonstrates that water quality for catchments with significant forest cover is generally better water quality compared with other land uses. Concerned PC1 will cause a significant decline in commercial forest activity in the Wellington region which, in turn, will impact the regional economy, make it harder to meet climate change targets, and may lead to negative environmental effects.	Not stated
S195.002	General comments	General comments - overall	~~Not Stated~~ Oppose	Considers PC1 is not necessary or desirable.	Not stated
S195.003	General comments	General comments - overall	Amend	Consider PC1 and S32 report do not meet requirements of S82(1)(a) of the Local Government Act 2002 . Considers members lack sufficient knowledge of Māori to understand parts of the documents.	Define more terms so there is less confusion and ambiguity. Translate Māori words into English, or have an English language version.
S195.004	General comments	General comments - current legislation	~~Not Stated~~ Oppose	Delete merged with above	Not stated
S195.005	General comments	General comments - plantation forestry	~~Not Stated~~ Oppose	Seeks replanting not be regulated in the proposed plan	Seeks replanting not be regulated in PC1
S195.006	General comments	General comments - plantation forestry	~~Not Stated~~ Oppose	Considers the proposed rules are a major disincentive for investment in commercial forestry and are likely to negatively impact opportunities to obtain an adequate return. Notes the conditions, or costs of meeting the conditions, will prevent land	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				from being harvested and the "highest risk" classification devalues the land and prevents the forest owner from obtaining an income from it. Considers PC1 will reduce the chances of meeting the Climate Change Commission advice to Government advocating increased planting of exotic forests between 2021 and 2030. Notes PC1 deters the submitter from advising planting trees as a long-term investment. Notes that under the Emissions Trading Scheme, owners are required to retain their land in forests after harvest. Notes if forest land is not replanted, it will generate no income and become a financial liability for the owner, while adding nothing to the region's social and economic wellbeing.	
S195.007	General comments	General comments - overall	Oppose	Considers the PC1 process has been rushed creating problems for those affected. Examples provided are as follows: Considers PC1 references and contains outdated definitions and regulations from the NES-PF despite this being superseded by the NES-CF regulations. Due to this, submitter considers it impossible to discern the actual meaning of the proposed new Plan. Considers the council's decision to make a submission to fix the missing controls on replanting included in the Section 32 report would be a significant departure from the publicly available intentions and is concerned that others may have made submissions had they known things were subject to change.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers Council have rejected recommendations from Te Awarua-o-Porirua WIP and Te Whanganui-a-Tara WIP for better enforcement of compliance and are undertaking a process that is complex, costly and addressing a problem has not been established with regulations that are unnecessary. It would be more cost effective to perform its role under the national standard.	
S195.008	General comments	General comments - plantation forestry	~~Not Stated~~ Oppose	Considers the council has not provided evidence to support claims within the S32 report forestry is responsible for the "current degraded state" of water bodies. Considers there is no evidence that the NES-PF failed to achieve the water quality standards of Greater Wellington, nor any evidence that the new, more stringent NES-CF will fail. Notes if PC1 is adopted, it would be impossible to determine whether or not the new regulations for forestry resulted in any discernible improvements in water quality. Considers without such evidence, there is no reason to undercut a national environmental standard.	Not stated
S195.009	General comments	General comments - plantation forestry	~~Not Stated~~ Oppose	Consider PC1 will make it impossible for many forest owners to provide for their economic well-being or to make reasonable use of their land. Notes this applies the following situations: Notes where forest land is classed as "highest risk," the owner will not be able to derive any revenue from its post-harvest, despite the continuing costs of rates and property maintenance. Considers small parts of a block classified as erosion prone may be essential for access or for harvest infrastructure. Concerned if they are not used, the forest might not be harvested becoming a stranded asset. Concerned it may be impossible to meet all forestry	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				activities conditions in PC1 such as, meeting the maximum sediment level of 100 grams / m3 of runoff. Considers compliance costs may be simply too high to bother.	
S195.010	General comments	General comments - plantation forestry	~~Not Stated~~ Oppose	Considers GWRC have not provided forestry specific evidence related to the Wellington region that demonstrates the NES-PF (and now the NES-CF) does not give effect to a specific objective developed to give effect to the NES-FW. Considers there is no justification for the proposed new forestry rules. Considers GWRC have not provided forestry specific evidence to show the new rules will achieve improvements in terms of any particular objective developed to give effect to the NES-FM. Notes there is no defined link between the proposed more stringent rules and a particular objective. By contrast, there is plenty of evidence that plantation forestry as a land use leads to reduced sediment loads and improved water quality. Suggests that what is proposed does not comply with regulation 6.1 in the NES-CF.	Not stated
S195.011	General comments	General comments - plantation forestry	~~Not Stated~~ Oppose	Considers the S32 report with respect to plantation forestry is deficient, incorrect, misleading and devoid of evidence problems are being caused by forestry or current forestry regulations. Considers the report omits mentioning that GWRC could be liable for compensation to China Forestry Group if PC1 goes ahead.	Not stated
S195.012	General comments	General comments - rural	~~Not Stated~~ Oppose	Considers the S32 reports assumption that the NES-CF is focussed on including carbon forestry in the national environmental standards and therefore the PC1 provisions are justified, is incorrect. Considers the NES-CF focuses on stronger environmental protection For example it has new	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				requirements for Afforestation Plans to manage erosion and sedimentation and Harvest Management Plans.	
S195.013	General comments	General comments - plantation forestry	~~Not Stated~~ Oppose	Considers the s32 reports statement regarding the NES-PF erosion susceptibility classification system in comparison to the ESC mapping undertaken for Greater Wellington to be incorrect and misleading. Notes the ESC mapping undertaken for Greater Wellington defines the 'highest-risk' land as the most erodible 10% of forest land by area and land use within each Whāitua. Considers this is a relative measure, not an absolute one. Notes that just because land is in the top 10% does not imply that it is at risk of erosion. Notes if Greater Wellington is concerned that the land in its area has been misclassified in the NES-CF, then there are channels to update the mapping and classifications.	Not stated
S195.014	General comments	General comments - plantation forestry	~~Not Stated~~ Oppose	Considers the S32 report intention to ensure plantation forestry does not establish or endure on highest erosion risk land and the most appropriate management practices are employed is laudable but inadequate. Considers it focuses on relative risk, not absolute risk. Notes if most of the land is erosion prone, then setting a target of 10% is irrelevant. Notes since the classification is by land use, there would always be a 'top 10%' of erosion risk land under plantation forestry and that land's retirement with each successive harvest would lead over time to very little plantation forestry remaining.	Not stated
S195.015	General comments	General comments -	~~Not Stated~~ Oppose	Notes the s32 report considers the notification process for forestry activities in the NES-PF is not fit for purpose, and there is no quality assurance or approval process provided for the notified plans.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		plantation forestry		Considers there is no evidence that the plans provided under the NES-PF and now under the NES-CF are inadequate. Notes recommendations asking the Council to better enforce compliance within the NES-PF rather than seek more stringent regulations. Acknowledges there have been breaches, but that this will happen with any regulation irrespective of its stringency. Notes Regional Council staff will not enforce plans unless there is a complaint. Suggests even Greater Wellington staff are slow to act. Notes Greater Wellington staff are not aware of the content of the current regulations and suggests better resourcing and training, rather than more regulations, would lead to better outcomes.	
S195.016	General comments	General comments - plantation forestry	~~Not Stated~~ Oppose	Comments for policy package option 1, for Plantation forestry and woody vegetation clearance and - efficiency and effectiveness of provisions, in the s32 report are as follows: Considers discrepancies in the interpretation of Te Awarua-o-Porirua WIP recommendations 54 and 55 within the S32 report. Suggests that these recommendations do not focus on improving plantation forestry management to reduce sediment, but rather call for changes within the framework of the NES-PF, contradicting the objectives of PC1. Also notes the request for Greater Wellington to work with the industry, which is not happening. Considers PC1 is not an adequate response to these recommendations. Considers that recommendation 37 is not focused on promoting best practices in plantation forestry	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				and monitoring compliance, as highlighted in the S32 report. Notes its focussed on the Council's staffing level and seeks alignment with the NES-PF to enhance outcomes. Considers recommendations WIP 76,77,78 do not require all harvesting to be approved by the Council, or to be a controlled activity. Considers PC1 does not achieve the outcomes sought in the WIP recommendations.	
S195.017	General comments	General comments - plantation forestry	~~Not Stated~~ Oppose	Comments for policy package options 2 and 3, for plantation forestry and woody vegetation clearance and - efficiency and effectiveness of provisions, in the s32 report are as follows: Considers the analysis confuses relative erosion risk with absolute erosion risk. Considers there is loose terminology, as New Policy uses the term "highest erosion risk" while New Rule uses "very high erosion risk," and the two terms are used synonymously when they are quite different. Very high erosion prone land is defined already in the provisions of the NES-CF and requires no change.	Not stated
S195.018	General comments	General comments - plantation forestry	~~Not Stated~~ Oppose	Disagrees with the assessment for options 1, 2 and 3 in the s32 report. Considers there is no basis for the claim that sediment generated by plantation forestry is a problem within the Greater Wellington area because of the regulations governing forestry. Considers there is no evidence of the NES-PF generating worse environmental outcomes in the Wellington area than the pre-2018 consenting regime, nor is there evidence that either forestry or the NES-PF is responsible for the 'current degraded state' of water bodies in the region.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Notes there are studies showing that over the course of a whole rotation, commercial forestry is much better than many other land uses at minimising sediment flows. An example is the Pakuratahi paired-catchment study. Contend that the environmental benefits of the three options are equal.	
S195.019	General comments	General comments - plantation forestry	~~Not Stated~~ Oppose	Delete	Not stated
S195.020	General comments	General comments - plantation forestry	~~Not Stated~~ Oppose	Disagrees with the assessment that the social costs of Option 1 or 3 will be low. Considers both options would reduce plantation forestry activity in the region, leading to job losses within the industry, at the port, and at regional sawmills dependent on logs from the area. Considers the analysis does not attempt to quantify those impacts. With all three options the submitter disputes that plantation forestry contributes in any significant way to the sedimentation of our rivers and argue PC1 is unnecessary. Considers the NES-CF is quite capable of regulating forestry activities to control sediment flows when enforced.	Not stated
S195.021	General comments	General comments - plantation forestry	~~Not Stated~~ Oppose	Considers the analysis in the Section 32 report does not quantify the monetary costs of the options. Notes other significant economic factors are the devaluation of forest land, the reduction of economic activity, and the loss of forest income from both timber and carbon credits. Suggests the economic costs of option 1 are high, and for option 3 are medium as both will increase	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				the costs and create a "negative benefit". Considers the analysis should state this.	
S195.022	General comments	General comments - plantation forestry	~~Not Stated~~ Oppose	Notes the analysis appears subjective rather than based on evidence or research. Considers making plantation forestry a controlled activity with 10% of the land to be retired will reduce the amount of land in forestry and may not improve water quality but reduce it. Considers there are more effective ways of improving water quality than those proposed under PC1.	Not stated
S195.023	General comments	General comments - plantation forestry	~~Not Stated~~ Oppose	Notes the costs of PC1 may outweigh the benefits because as there is no evidence quantifying how much sediment is attributable to which land use, there is a high risk of adding costs without achieving real benefits.	Not stated
S195.024	General comments	General comments - definitions	Not Stated	PC1 uses the term 'plantation forestry' but it does not define it. Similarly it does not define 'harvesting.' There are alternatives to clear-felling, such as small coupe harvesting and continuous cover harvesting, which have little impact on either biodiversity or water quality. PC1 refers to an 'FMU,' yet this is only defined in the Section 32 report.	Define plantation forestry in accordance with NES-CF Define harvesting and exclude continuous cover and small coupe harvesting Define FMU
S195.025	General comments	General comments - maps	Oppose	Notes in the 2023 report by Easton Nation and Blyth, Forestry erosion risk is based on potential erosion risk on land currently in forestry should that land be converted to pasture. Consider the measure of erosion risk used is questionable as replanting forestry has a lower erosion risk than converting land to pasture. Considers the mapping resulting from the report by Easton Nation and Blyth is not useful for managing a forest, as it uses 5m by 5 m pixels when forests are managed to the nearest 0.5 ha. Suggests the mapping would have required at least a contiguous	~~Not stated .~~ Remapping is required

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				size of 0.5 ha for each class of risk to be credible.	
S195.026	General comments	General comments - target attribute states	Oppose	Considers Tables 8.4, 8.5 and 9.2 are at odds with the NPS-FW. Questions why the tables use a mix of states and numeric measurements; why parts have no information; or why there is no acknowledgement that further measurements are required to define a TAS. Acknowledges many of the numeric attributes used have not actually been measured, but are the result of modelling.	Withdraw Tables 8.4, 8.5 and 9.2, undertake review of them and do not reinstate them until reviewed by an independent party.
S195.027	General comments	General comments - overall	Not Stated	Where they are not in conflict with this submission, supports the submissions from New Zealand Farm Forestry association - Wellington Branch, New Zealand Carbon Farming Group, Forest Enterprises, China National Forestry Group, John Turkington Limited and Juken New Zealand Limited.	Not stated
S195.028	General comments	General comments - overall	~~Not Stated~~ Oppose	Considers PC1 needs to be rethought if it is to be effective in controlling the continued degradation of water quality in the region and helping improve the NRP.	Not stated
S195.029	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Oppose	Considers PC1 rules should not override The National Environmental Standards for Plantation Forestry (NES-PF) until that need is proven.	Delete rules in PC1 that are more stringent than the NES-CF
S195.030	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry - discretionary activity.	Oppose	Considers PC1 rules should not override The National Environmental Standards for Plantation Forestry (NES-PF) until that need is proven.	Delete rules in PC1 that are more stringent than the NES-CF
S195.031	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on	Oppose	Considers PC1 rules should not override The National Environmental Standards for Plantation Forestry (NES-PF) until that need is proven.	Delete rules in PC1 that are more stringent than the NES-CF

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		highest erosion risk land - prohibited activity.			
S195.032	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry - controlled activity.	Oppose	Considers PC1 rules should not override The National Environmental Standards for Plantation Forestry (NES-PF) until that need is proven.	Delete rules in PC1 that are more stringent than the NES-CF
S195.033	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry - discretionary activity.	Oppose	Considers PC1 rules should not override The National Environmental Standards for Plantation Forestry (NES-PF) until that need is proven.	Delete rules in PC1 that are more stringent than the NES-CF
S195.034	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity.	Oppose	Considers PC1 rules should not override The National Environmental Standards for Plantation Forestry (NES-PF) until that need is proven.	Delete rules in PC1 that are more stringent than the NES-CF
S195.035	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Oppose	Object to policies WH.P2, P.P2, WH.P28 and policy P.P26 as far as they relate to forestry.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S195.036	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Oppose	Object to policies WH.P2, P.P2, WH.P28 and policy P.P26 as far as they relate to forestry.	Not stated
S195.037	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Oppose	Object to policies WH.P2, P.P2, WH.P28 and policy P.P26 as far as they relate to forestry.	Not stated
S195.038	9 Te Awarua-o-Porirua Whaitua	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Oppose	Object to policies WH.P2, P.P2, WH.P28 and policy P.P26 as far as they relate to forestry.	Not stated
S195.039	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Oppose	Considers the classification of land as high or highest risk does not express the absolute risk, but rather the risk relative to all other land with the same land use. The submitter notes a block of grazing land, adjacent to an existing forest on the same type of land could be classified as highest risk while the	Remove afforestation from P.R.19 and WH.R20 Should neither the plan change process nor the courts accept this submission point it is requested that for afforestation activities, Rule P.R19 (b) and Rule WH.R20 (b)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				forests next to it would not. Considers this would prevent the agricultural land from being afforested despite the change resulting in higher water quality. Considers the relative assessment of risk is commercially and environmentally unsound, and appears biased against forestry. Considers for forestry, the information requirements in Schedule 34 such as details may not be known because forests are generally harvested when they are between 25 and 60 years old when harvesting or management techniques may have evolved. Questions why the information requested is required. Considers planting trees does not significantly increase the erosion risk or sediment discharge from land and planting timber trees has no greater effect on water quality than planting apple trees or cabbages. Due to this, there is considered to be no benefit in requiring an erosion and sediment management plan certified by a registered Forestry Adviser. As the RMA requires policies and rules to be effects based, it is considered these rules do not appear to comply.	be removed and the ESC classification of erosion risk used in the NES-CF be applied
S195.040	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry - controlled activity.	Oppose	Considers these rules impractical for the following reasons: Considers the rules are unnecessarily harsh as when a heavy rain event leads to the visual clarity exceeding the target condition at a single measurement site in the catchment, no further afforestation can take place until all measurement sites show acceptable values again. Considers the rules create an anomaly as pasture	Should neither the plan change process nor the courts accept the removal of Rule P.R19 and Rule WH.R20 for afforestation activities, it is requested that for afforestation activities conditions (c) and (d) be removed from Rule P.R19 and Rule WH.R20.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				areas with a high erosion risk must be retired to woody vegetation regardless of water clarity. However, if water clarity is poor, rules may prevent planting trees in non-erosion-prone forest land within the same catchment. Notes A FMU may cover several distinct catchments but with only one measurement point. Considers a failure of visual clarity in one catchment should not affect the consented right to plant in another catchment within the same FMU. Suggests the rules are too broadly drafted.	
S195.041	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Oppose	Considers the classification of land as high or highest risk does not express the absolute risk, but rather the risk relative to all other land with the same land use. The submitter notes a block of grazing land, adjacent to an existing forest on the same type of land could be classified as highest risk while the forests next to it would not. Considers this would prevent the agricultural land from being afforested despite the change resulting in higher water quality. Considers the relative assessment of risk is commercially and environmentally unsound, and appears biased against forestry. Considers for forestry, the information requirements in Schedule 34 such as details may not be known because forests are generally harvested when they are between 25 and 60 years old when harvesting or management techniques may have evolved. Questions why the information requested is required. Considers planting trees does not significantly increase the erosion risk or sediment discharge from land and planting timber trees has no greater effect on water quality than planting apple trees or cabbages. Due to this, there is considered to be no	Remove afforestation from P.R.19 and WH.R20 Should neither the plan change process nor the courts accept this submission point it is requested that for afforestation activities, Rule P.R19 (b) and Rule WH.R20 (b) be removed and the ESC classification of erosion risk used in the NES-CF be applied

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				benefit in requiring an erosion and sediment management plan certified by a registered Forestry Adviser. As the RMA requires policies and rules to be effects based, it is considered these rules do not appear to comply.	
S195.042	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Oppose	Considers these rules impractical for the following reasons: Considers the rules are unnecessarily harsh as when a heavy rain event leads to the visual clarity exceeding the target condition at a single measurement site in the catchment, no further afforestation can take place until all measurement sites show acceptable values again. Considers the rules create an anomaly as pasture areas with a high erosion risk must be retired to woody vegetation regardless of water clarity. However, if water clarity is poor, rules may prevent planting trees in non-erosion-prone forest land within the same catchment. Notes A FMU may cover several distinct catchments but with only one measurement point. Considers a failure of visual clarity in one catchment should not affect the consented right to plant in another catchment within the same FMU. Suggests the rules are too broadly drafted.	Should neither the plan change process nor the courts accept the removal of Rule P.R19 and Rule WH.R20 for afforestation activities, it is requested that for afforestation activities conditions (c) and (d) be removed from Rule P.R19 and Rule WH.R20.
S195.043	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry - controlled activity.	Oppose	Questions whether GWRC has the staff, or technical and commercial expertise, to exercise the controls specified in (1) and (2). Considers the Whaitua recommendation observed that the Council could not discharge its responsibilities under the NES-PF. Considers the	Remove items (1) and (2) from the Matters of Control.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Council could face high liabilities if they get things wrong.	
S195.044	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Oppose	Questions whether GWRC has the staff, or technical and commercial expertise, to exercise the controls specified in (1) and (2). Considers the Whaitua recommendation observed that the Council could not discharge its responsibilities under the NES-PF. Considers the Council could face high liabilities if they get things wrong.	Remove items (1) and (2) from the Matters of Control.
S195.045	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry - discretionary activity.	Oppose	Considers the classification of forest land as "highest risk" is a relative rather than absolute assessment. Objects to the proposed classification and seeks it be replaced with the Erosion Susceptibility Classification (ESC) used in the NES-CF. Considers no reasoning or scientific evidence has been provided to justify the discharge limit of 100 grams /m3. Notes, during moderate rainfall, unsealed roads or a recent small slip will discharge more than 100gm/m3. Considers that as this limit is routinely breached on Council or DOC land, there is no justification to apply it to private land. Contends that the proposed discharge limits will make any harvesting or earthworks impossible as a controlled activity. Notes the rules require the landowner to provide a certified Erosion and Sediment Management Plan that shows all activities will meet the discharge standard in Rule P.R19 (c) and Rule WH.R20 (c). As the discharge limit applies even in adverse conditions, the submitter considers it will be impossible for any certifying authority to guarantee full compliance under adverse conditions and will likely not carry the risk associated with such a certification.	Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Questions why Rules R.P19, P.20, and P.R21 are not consistent with Rule R.P22 which adopts the NES-CF approach of requiring the use of best practice standards to minimise the discharge of sediment. Questions how, given that discharges from earthworks are much higher than discharges from forestry, there could be a more rigid limit for forestry activities than earthworks. Notes the same also applies to rule Rules WH.R20, WH.R21, and WH.R22 in comparison the Rule WH.R23. Considers there are issues with Clause (d) which states for a harvesting consent the visual clarity measurement target must be met at each monitoring site in the relevant part FMU. Notes some waterbodies in a part FMU do not drain into a catchment which is monitored by a measurement point. Considers forest owners should not be penalised for something that happens in an unrelated catchment. Notes a possibly illegal discharge of sediment by a third party could prevent a forest owner from being able to harvest, despite meeting all his legal obligations. Concerned there is no provision in the rules for appealing such a situation.	
S195.046	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry - controlled activity.	Oppose	Considers the classification of forest land as "highest risk" is a relative rather than absolute assessment. Objects to the proposed classification and seeks it be replaced with the Erosion Susceptibility Classification (ESC) used in the NES-CF. Considers no reasoning or scientific evidence has been provided to justify the discharge limit of 100	Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				grams /m3. Notes, during moderate rainfall, unsealed roads or a recent small slip will discharge more than 100gm/m3. Considers that as this limit is routinely breached on Council or DOC land, there is no justification to apply it to private land. Contends that the proposed discharge limits will make any harvesting or earthworks impossible as a controlled activity. Notes the rules require the landowner to provide a certified Erosion and Sediment Management Plan that shows all activities will meet the discharge standard in Rule P.R19 (c) and Rule WH.R20 (c). As the discharge limit applies even in adverse conditions, the submitter considers it will be impossible for any certifying authority to guarantee full compliance under adverse conditions and will likely not carry the risk associated with such a certification. Questions why Rules R.P19, P.20, and P.R21 are not consistent with Rule R.P22 which adopts the NES-CF approach of requiring the use of best practice standards to minimise the discharge of sediment. Questions how, given that discharges from earthworks are much higher than discharges from forestry, there could be a more rigid limit for forestry activities than earthworks. Notes the same also applies to rule Rules WH.R20, WH.R21, and WH.R22 in comparison the Rule WH.R23. Considers there are issues with Clause (d) which states for a harvesting consent the visual clarity measurement target must be met at each monitoring site in the relevant part FMU. Notes some waterbodies in a part FMU do not drain into a catchment which is monitored by a measurement point. Considers forest owners should not be penalised for something that happens in an	

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				unrelated catchment. Notes a possibly illegal discharge of sediment by a third party could prevent a forest owner from being able to harvest, despite meeting all his legal obligations. Concerned there is no provision in the rules for appealing such a situation.	
S195.047	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity.	Oppose	Considers the classification of forest land as "highest risk" is a relative rather than absolute assessment. Objects to the proposed classification and seeks it be replaced with the Erosion Susceptibility Classification (ESC) used in the NES-CF. Considers no reasoning or scientific evidence has been provided to justify the discharge limit of 100 grams /m3. Notes, during moderate rainfall, unsealed roads or a recent small slip will discharge more than 100gm/m3. Considers that as this limit is routinely breached on Council or DOC land, there is no justification to apply it to private land. Contends that the proposed discharge limits will make any harvesting or earthworks impossible as a controlled activity. Notes the rules require the landowner to provide a certified Erosion and Sediment Management Plan that shows all activities will meet the discharge standard in Rule P.R19 (c) and Rule WH.R20 (c). As the discharge limit applies even in adverse conditions, the submitter considers it will be impossible for any certifying authority to guarantee full compliance under adverse conditions and will likely not carry the risk associated with such a certification. Questions why Rules R.P19, P.20, and P.R21 are not consistent with Rule R.P22 which adopts the NES-CF approach of requiring the use of best	Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				practice standards to minimise the discharge of sediment. Questions how, given that discharges from earthworks are much higher than discharges from forestry, there could be a more rigid limit for forestry activities than earthworks. Notes the same also applies to rule Rules WH.R20, WH.R21, and WH.R22 in comparison the Rule WH.R23. Considers there are issues with Clause (d) which states for a harvesting consent the visual clarity measurement target must be met at each monitoring site in the relevant part FMU. Notes some waterbodies in a part FMU do not drain into a catchment which is monitored by a measurement point. Considers forest owners should not be penalised for something that happens in an unrelated catchment. Notes a possibly illegal discharge of sediment by a third party could prevent a forest owner from being able to harvest, despite meeting all his legal obligations. Concerned there is no provision in the rules for appealing such a situation.	
S195.048	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Oppose	Considers the classification of forest land as "highest risk" is a relative rather than absolute assessment. Objects to the proposed classification and seeks it be replaced with the Erosion Susceptibility Classification (ESC) used in the NES-CF. Considers no reasoning or scientific evidence has been provided to justify the discharge limit of 100 grams /m3. Notes, during moderate rainfall, unsealed roads or a recent small slip will discharge more than 100gm/m3. Considers that as this limit is	Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				routinely breached on Council or DOC land, there is no justification to apply it to private land. Contends that the proposed discharge limits will make any harvesting or earthworks impossible as a controlled activity. Notes the rules require the landowner to provide a certified Erosion and Sediment Management Plan that shows all activities will meet the discharge standard in Rule P.R19 (c) and Rule WH.R20 (c). As the discharge limit applies even in adverse conditions, the submitter considers it will be impossible for any certifying authority to guarantee full compliance under adverse conditions and will likely not carry the risk associated with such a certification. Questions why Rules R.P19, P.20, and P.R21 are not consistent with Rule R.P22 which adopts the NES-CF approach of requiring the use of best practice standards to minimise the discharge of sediment. Questions how, given that discharges from earthworks are much higher than discharges from forestry, there could be a more rigid limit for forestry activities than earthworks. Notes the same also applies to rule Rules WH.R20, WH.R21, and WH.R22 in comparison the Rule WH.R23. Considers there are issues with Clause (d) which states for a harvesting consent the visual clarity measurement target must be met at each monitoring site in the relevant part FMU. Notes some waterbodies in a part FMU do not drain into a catchment which is monitored by a measurement point. Considers forest owners should not be penalised for something that happens in an unrelated catchment. Notes a possibly illegal discharge of sediment by a	

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				third party could prevent a forest owner from being able to harvest, despite meeting all his legal obligations. Concerned there is no provision in the rules for appealing such a situation.	
S195.049	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry - discretionary activity.	Oppose	Considers the classification of forest land as "highest risk" is a relative rather than absolute assessment. Objects to the proposed classification and seeks it be replaced with the Erosion Susceptibility Classification (ESC) used in the NES-CF. Considers no reasoning or scientific evidence has been provided to justify the discharge limit of 100 grams /m3. Notes, during moderate rainfall, unsealed roads or a recent small slip will discharge more than 100gm/m3. Considers that as this limit is routinely breached on Council or DOC land, there is no justification to apply it to private land. Contends that the proposed discharge limits will make any harvesting or earthworks impossible as a controlled activity. Notes the rules require the landowner to provide a certified Erosion and Sediment Management Plan that shows all activities will meet the discharge standard in Rule P.R19 (c) and Rule WH.R20 (c). As the discharge limit applies even in adverse conditions, the submitter considers it will be impossible for any certifying authority to guarantee full compliance under adverse conditions and will likely not carry the risk associated with such a certification. Questions why Rules R.P19, P.20, and P.R21 are not consistent with Rule R.P22 which adopts the NES-CF approach of requiring the use of best practice standards to minimise the discharge of sediment.	Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Questions how, given that discharges from earthworks are much higher than discharges from forestry, there could be a more rigid limit for forestry activities than earthworks. Notes the same also applies to rule Rules WH.R20, WH.R21, and WH.R22 in comparison the Rule WH.R23. Considers there are issues with Clause (d) which states for a harvesting consent the visual clarity measurement target must be met at each monitoring site in the relevant part FMU. Notes some waterbodies in a part FMU do not drain into a catchment which is monitored by a measurement point. Considers forest owners should not be penalised for something that happens in an unrelated catchment. Notes a possibly illegal discharge of sediment by a third party could prevent a forest owner from being able to harvest, despite meeting all his legal obligations. Concerned there is no provision in the rules for appealing such a situation.	
S195.050	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.	Oppose	Considers the classification of forest land as "highest risk" is a relative rather than absolute assessment. Objects to the proposed classification and seeks it be replaced with the Erosion Susceptibility Classification (ESC) used in the NES-CF. Considers no reasoning or scientific evidence has been provided to justify the discharge limit of 100 grams /m3. Notes, during moderate rainfall, unsealed roads or a recent small slip will discharge more than 100gm/m3. Considers that as this limit is routinely breached on Council or DOC land, there is no justification to apply it to private land. Contends that the proposed discharge limits will make any	Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				harvesting or earthworks impossible as a controlled activity. Notes the rules require the landowner to provide a certified Erosion and Sediment Management Plan that shows all activities will meet the discharge standard in Rule P.R19 (c) and Rule WH.R20 (c). As the discharge limit applies even in adverse conditions, the submitter considers it will be impossible for any certifying authority to guarantee full compliance under adverse conditions and will likely not carry the risk associated with such a certification. Questions why Rules R.P19, P.20, and P.R21 are not consistent with Rule R.P22 which adopts the NES-CF approach of requiring the use of best practice standards to minimise the discharge of sediment. Questions how, given that discharges from earthworks are much higher than discharges from forestry, there could be a more rigid limit for forestry activities than earthworks. Notes the same also applies to rule Rules WH.R20, WH.R21, and WH.R22 in comparison the Rule WH.R23. Considers there are issues with Clause (d) which states for a harvesting consent the visual clarity measurement target must be met at each monitoring site in the relevant part FMU. Notes some waterbodies in a part FMU do not drain into a catchment which is monitored by a measurement point. Considers forest owners should not be penalised for something that happens in an unrelated catchment. Notes a possibly illegal discharge of sediment by a third party could prevent a forest owner from being able to harvest, despite meeting all his legal obligations. Concerned there is no provision in the	

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				rules for appealing such a situation.	
S195.051	12 Schedules	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	Oppose	In Objective B (2) it is noted the term 'natural state' is undefined. Considers if this objective is to apply to forest land it should equally apply to other land uses. Considers the identification and classification of 'highest erosion risk' land relied on in Objective B (4) is unsuitable.	Remove objectives B (2) and B (4) from Schedule 34.

S239 Orogen Limited

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S239.002	General comments	General comments - definitions	Not Stated	Seeks the addition for a definition for "greenfield development", particularly for the application of Rules WH.R6 and P.R6	Add definition of 'greenfield development' to Chapter 2.2.
S239.003	2 Interpretation	Earthworks	Amend	Concerned the definition removes the former exclusions that apply in all other whaitua, which are typically low-risk activities that required limited disturbance in comparison with earthwork activities that were not previously excluded. Considers including these former exclusions under the broad definition of 'earthworks' overstates the associated risk and will hamper development in the region. Notes that excluded activities may then have their own set of rules to manage their effects appropriately and acknowledge their lower risk.	**Amend the definition of 'earthworks':** **The alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes: ~~gardening, cultivation, and disturbance of land for the installation of fence posts~~**(a) cultivation of the soil for the establishment of crops or pasture, and (b) the harvesting of crops, and (c) thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and (d) the construction, repair, upgrade or maintenance of: (i) pipelines, and (ii) electricity lines and their support structures, including the National Grid, and (iii) telecommunication structures or lines, and (iv) radio communication structures, and

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					(v) firebreaks or fence lines, and (vi) a bore or geotechnical investigation bore, and (e) repair or maintenance of existing roads and tracks, and airfield runways, taxiways, and parking aprons for aircraft, and (f) maintenance of orchards and shelterbelts, and (g) domestic gardening, and (h) repair, sealing or resealing of a road, footpath, driveway, and (i) discharge of cleanfill material to a cleanfill area **Except that, for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20, 'earthworks' has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.** **Create a new definition and associated set of rules for the excluded activities, including:** **(a) cultivation of the soil for the establishment of crops or pasture, and** **(b) the harvesting of crops, and** **(c) thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and** **(d) the construction, repair, upgrade or maintenance of:** **(i) pipelines, and** **(ii) electricity lines and their support structures, including the National Grid, and** **(iii) telecommunication structures or lines, and** **(iv) radio communication structures, and** **(v) firebreaks or fence lines, and** **(vi) a bore or geotechnical investigation bore, and** **(j) repair or maintenance of existing roads and tracks, and airfield runways, taxiways, and parking aprons for aircraft, and** **(k) maintenance of orchards and shelterbelts, and** **(l) domestic gardening, and** **(m) repair, sealing or resealing of a road, footpath,**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					driveway, and **(n) discharge of cleanfill material to a cleanfill area**
S239.004	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Amend	Does not support earthworks during the period 1st June to 30th September being a non-complying activity, however acknowledges that seasonal variations in rainfall and groundwater should be taken into consideration.	Earthworks over 3,000m2 in area shall: (a) ~~be shut down~~ require erosion and sediment controls appropriate for seasonal variations in rainfall and groundwater from 1st June to 30th September each year, and~~(b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).~~
S239.005	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Considers there is ambiguity regarding "greenfield development". Seeks a definition for "greenfield development".	Add definition of 'greenfield development' to Chapter 2.2.
S239.006	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Considers there is ambiguity regarding "greenfield development". Seeks a definition for "greenfield development".	Add definition of 'greenfield development' to Chapter 2.2.
S239.007	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redevelop	Amend	Considers there is ambiguity regarding "greenfield development". Seeks a definition for "greenfield development".	Add definition of 'greenfield development' to Chapter 2.2.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		ed impervious surfaces - discretionary activity.			
S239.008	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Considers the application of the Prohibited activity status too widespread, particularly for minor extensions of impervious surfaces. Considers that various consenting pathways should be available to accommodate different scales of activities in unplanned greenfield areas.	Reconsider Rules WH.R13 & P.R12, for example, through: -A revised activity status, or -Additional exclusions to the Rule
S239.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	Considers the discharge of sediment from earthworks is unavoidable even with the use of sediment controls. Cites the technical reports for PC1, which reference studies specifying that the sediment removal of all devices are less than 100% and sediment discharges continue to occur, albeit at lower rates, even when the earthworks area is stabilised. Considers no earthworks will meet the permitted activity criteria, regardless of size and treatment.	(iv) There is no discharge of runoff ~~sediment~~ from earthworks ~~and/or flocculant~~ into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, that is not treated by erosion and sediment control measures, ~~and~~ ~~(v) Erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.~~
S239.010	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Oppose	Considers the proposed TSS limit of 100g/m3 is too restrictive, and is a significant reduction from the existing threshold of 170 NTU that is currently imposed on land use consents. Considers that the proposed TSS limit has not been informed by empirical data on sediment control device performance across the Wellington region, or sufficient scientific evidence. States that the technical publications for PC1 do not mention the TSS standard of 100g/m3 and considers there is a lack of connection between the technical reports on the receiving water bodies and the proposed discharge standard. Seeks for the discharge	The submitter requests that the proposed total suspended solids limit is re-drafted to a meaningful threshold that achieves the outcomes sought. The submitter requests that provision is made for the use of NTU (nephelometric turbidity units) as an acceptable unit of measurement.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				standard to be redrafted in accordance with the best information available, in accordance with Section 1.6 of the NPS-FM. Considers measuring turbidity (NTU) is a reliable proxy for TSS, noting the long testing period for TSS results. Considers the proposed discharge standard disincentivises the use of high efficiency sediment devices, while increasing compliance risks. Concerned that the GWRC Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021) does not provide sufficient guidance to comply with the standard. Considers that the use of low efficiency devices will be encouraged, which will achieve compliance, however will decrease regional performance against target attribute states.	
S239.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Oppose	Concerned with the proposed non-complying activity status, stating that at the time that consent is applied for, information is not accurate enough to forecast site conditions during the "winter earthworks" period, particularly for larger earthworks which span over preceding non-winter months. Considers a non-complying activity status and requiring the supporting information at the consenting phase will mean the quality of the information provided is poor and will be reliant on assumptions including the size and location of earthworks, the type of construction activities, the performance of the proposed sediment control devices, seasonal variations in the local environment, and the applicant's resourcing capabilities Seeks for the retention of existing mechanisms for	Delete (b). Insert earthworks activities during the winter period as a matter of discretion.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				the applications for winter works, allowing for higher quality information to be provided.	
S239.012	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Amend	Does not support earthworks within the proposed winter period being a non-complying activity, however acknowledges that seasonal variations in rainfall and groundwater should be taken into consideration.	Earthworks over 3,000m2 in area shall: (a) ~~be shut down~~ require erosion and sediment controls appropriate for seasonal variations in rainfall and groundwater from 1st June to 30th September each year, ~~and~~ ~~(b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).~~
S239.013	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Considers there is ambiguity regarding "greenfield development". Seeks a definition for "greenfield development".	Add definition of 'greenfield development' to Chapter 2.2.
S239.014	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Considers there is ambiguity regarding "greenfield development". Seeks a definition for "greenfield development".	Add definition of 'greenfield development' to Chapter 2.2.
S239.015	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped	Amend	Considers there is ambiguity regarding "greenfield development". Seeks a definition for "greenfield development".	Add definition of 'greenfield development' to Chapter 2.2.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		impervious surfaces-discretionary activity.			
S239.016	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Oppose	Considers the application of the Prohibited activity status too widespread, particularly for minor extensions of impervious surfaces. Considers that various consenting pathways should be available to accommodate different scales of activities in unplanned greenfield areas.	Reconsider Rules WH.R13 & P.R12, for example, through: -A revised activity status, or -Additional exclusions to the Rule
S239.017	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Oppose	Considers the discharge of sediment from earthworks is unavoidable even with the use of sediment controls. Cites the technical reports for PC1, which reference studies specifying that the sediment removal of all devices are less than 100% and sediment discharges continue to occur, albeit at lower rates, even when the earthworks area is stabilised. Considers no earthworks will meet the permitted activity criteria, regardless of size and treatment.	(iv) There is no discharge of runoff ~~sediment~~ from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, that is not treated by erosion and sediment control measures, ~~and~~ ~~(v) Erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.~~
S239.018	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Oppose	Considers the proposed TSS limit of 100g/m3 is too restrictive, and is a significant reduction from the existing threshold of 170 NTU that is currently imposed on land use consents. Considers the proposed TSS limit has not been informed by empirical data on sediment control device performance across the Wellington region, or sufficient scientific evidence. States that the technical publications for PC1 do not mention the TSS standard of 100g/m3 and considers there is a lack of connection between the technical reports on	The submitter requests that the proposed total suspended solids limit is re-drafted to a meaningful threshold that achieves the outcomes sought. The submitter requests that provision is made for the use of NTU (nephelometric turbidity units) as an acceptable unit of measurement.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				the receiving water bodies and the proposed discharge standard. Seeks for the discharge standard to be redrafted in accordance with the best information available, in accordance with Section 1.6 of the NPS-FM. Considers measuring turbidity (NTU) is a reliable proxy for TSS, noting the long testing period for TSS results. Considers the proposed discharge standard disincentivises the use of high efficiency sediment devices, while increasing compliance risks. Concerned that the GWRC Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021) does not provide sufficient guidance to comply with the standard. Considers that the use of low efficiency devices will be encouraged, which will achieve compliance, however will decrease regional performance against target attribute states.	
S239.019	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Oppose	Concerned with the proposed non-complying activity status, stating that at the time that consent is applied for, information is not accurate enough to forecast site conditions during the "winter earthworks" period, particularly for larger earthworks which span over preceding non-winter months. Considers a non-complying activity status and requiring the supporting information at the consenting phase will mean the quality of the information provided is poor and will be reliant on assumptions including the size and location of earthworks, the type of construction activities, the performance of the proposed sediment control devices, seasonal variations in the local environment, and the applicant's resourcing capabilities	Delete (b). Insert earthworks activities during the winter period as a matter of discretion.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Seeks for the retention of existing mechanisms for the applications for winter works, allowing for higher quality information to be provided.	
S239.020	12 Schedules	Schedule 28: Stormwater Contaminant Treatment.	Amend	Seeks for Schedule 28 to include all management practices as specified in the Water Sensitive Design for Stormwater: Treatment Device Guideline (Farrant et al. 2019), particularly the inclusion of pervious paving.	Include the use of pervious paving in keeping with the Water Sensitive Design for Stormwater: Treatment Device Guideline (Farrant et al. 2019).

S040 Pamela Govan

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S40.001	General comments	General comments - water bodies	Not Stated	Supports PC1.	Not stated.
S40.002	General comments	General comments - overall	Not Stated	Supports the objectives for Te Whanganui a Tara and Te Awarua o Porirua.	Not stated.
S40.003	General comments	General comments - target attribute states	Not Stated	Supports the Target Attribute States proposed.	Not stated.
S40.004	General comments	General comments - unplanned greenfield development	Not Stated	Supports the inducement to do less on greenfield land and more on brownfield.	Not stated.

S40.005	General comments	General comments - overall	Not Stated	Encourages councils to resource enforcement, science and complementary policy tools (education, industrial water plans and community governance) and the continued involvement of mana whenua and citizen water-care activity.	Not stated.

S213 Pareraho Forest Trust

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S213.001	2 Interpretation	Earthworks	Support	Supports definition, specifically capturing all land disturbance activities with risk of significant sediment loss to water.	Retain as notified
S213.002	6 Other methods	6.16 Freshwater Action Plan programme	Support	Supports the method specifying that FAPs may be prepared with discretionary attribute states or environmental outcomes identified in partnership with mana whenua or with the community	Retain as notified
S213.003	6 Other methods	Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	Submitters catchment is home to nationally threatened freshwater species, and contains fish passage barriers.	Add wording to draw a link between these two plan types (M39 and M40) and the site specific FAPs in order that community catchment groups can collectively contribute to action planning for threatened species and fish passage throughout the Whaitua and as it pertains to their catchment of interest.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S213.004	6 Other methods	Method M41: Identifying and responding to degradation in freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	Supports transparent and regular reporting of degradation in all waterbodies. Concerns frequency needs to increase for quicker intervention	Amend wording to increase frequency of monitoring: ~~five~~ **three** years.
S213.005	6 Other methods	Method M43: Supporting the health of urban waterbodies.	Support	Not stated	Retain as notified
S213.006	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Support	Not stated	Retain as notified
S213.007	6 Other methods	Method M45: Funding of wastewater and	Support	Concerns financial cost of task exceeds what can be raised from locals. Considers government support needed.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		stormwater network upgrades			
S213.008	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.	Support	Strongly support improvement of health for all freshwater in Whaitua. Considers there is room for improvement to raise te mana o te wai, including its safety for recreation, mahinga kai, taonga species and ecological health.	Retain as notified
S213.009	8 Whaitua Te Whanganui-a-Tara	Objective WH.O2: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands and their margins	Support	Considers streams have too much deposited sediment in places and lowering sediment input from erosion-prone headwaters and earthworks will improve health and wellbeing.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		are on a trajectory of measurable improvement towards wai ora.			
S213.010	8 Whaitua Te Whanganui-a-Tara	Objective WH.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved to achieve the coastal water objectives set out in Table 8.1.	Support	Hopes freshwater objectives result in improved parameters for the harbour and estuaries, rather than just maintained state.	Retain as notified
S213.011	8 Whaitua Te Whanganui-a-Tara	Objective WH.O4: The extent, condition, and	Support	Supports improved catchment quality for more diverse, abundant and healthy populations of threatened species including 'Lamprey'.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		connectivity of habitats of nationally threatened freshwater species are increased and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status.			
S213.012	8 Whaitua Te Whanganui-a-Tara	Objective WH.O5: By 2040 the health and wellbeing of the Parangarahu Lakes and associated natural wetlands are on a	Support	Recognises mana whenua and significance of rare/special lakes and wetlands in Whaitua. Concerns with loss of wetlands and need for protection, the creation, construction or restoration of wetlands.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		trajectory of improvement towards wai ora.			
S213.013	8 Whaitua Te Whanganui-a-Tara	Objective WH.O8: Primary contact sites within Te Awa Kairangi/Hutt River, Pākuratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact.	Amend	Requests adding Speedys Stream at Taniwha Pool to WH.O8. WWL monitor E.coli so a baseline numeric is available. Notes wastewater pipe leaks have resulted in removal of the site from community swimming activities. Considers TAS should be set to a state that improves on the current state. Resolving regular sewage overflows into streams and making them consistently suitable for contact recreation is valued and expected by the local community.	Add Speedys Stream at Taniwha Pool to Map 85 as a primary contact site. Identify and add similar small stream sites of high recreational contact in the Whaitua.
S213.014	8 Whaitua Te Whanganui-a-Tara	Objective WH.O9: Water quality, habitats, water quantity and ecological processes of rivers are maintaine	Amend	Questions why Fish Community Health TAS is only C, considering Korokoro, Speedys and Dry Creek catchments are protected by GW Key Native Ecosystems (in part) for fish diversity and are important sites for improving threatened species diversity, condition and abundance.	Increase FCH parameter for Korokoro part-FMU to a TAS of B.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		d or improved.			
S213.015	8 Whaitua Te Whanganui-a-Tara	Policy WH.P1: Improvement of aquatic ecosystem health.	Support	Not stated	Retain as notified
S213.016	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Support	Not stated	Retain as notified
S213.017	8 Whaitua Te Whanganui-a-Tara	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Support	Not stated	Retain as notified
S213.018	8 Whaitua Te Whanganui-a-Tara	Policy WH.P4: Achievement of the visual clarity	Support	Notes lowering the Te Awakairangi lower mainstream load of 100kt/year by 24% requires action across all tributary catchments including our part-FMU.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		target attribute states.			
S213.019	8 Whaitua Te Whanganui-a-Tara	Policy WH.P8: Avoiding discharges of specific products and waste.	Amend	Notes observation of illegal discharges of substances into the stormwater network that ends up in streams. Seeks GWRC action plans include public education and promotion of importance for appropriate disposal of hazardous liquids.	Add a subpoint requiring Greater Wellington to undertake public education and highlight the impact of disposing of polluting liquids in stormwater.
S213.020	8 Whaitua Te Whanganui-a-Tara	Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy.	Amend	Considers (f) should include prioritising Schedule F sites. Notes stormwater discharges impact on indigenous fish populations including threatened species. Notes lack of stormwater reduction, removal and treatment of stormwater discharges for urban areas and recent greenfield development needs to be addressed through stream health improvements and achieving objectives of this Plan Change.	Add Schedule F sites to (f)
S213.021	8 Whaitua Te Whanganui-a-Tara	Policy WH.P17: General wastewater policy to achieve target attribute states and coastal objectives.	Support	Notes stream is often subject to dry and wet weather wastewater discharges from network pipes in both Belmont and Kelson. Supports Kaitiaki monitoring teams and offers assistance with monitoring.	Not stated
S213.022	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Support	Supports (including financially) reduction in pollution from urban land use and infrastructure. Considers importance and fairness that pollution from rural landuse also contributes, supported by GWRC, through the actions outlined in these policies.	Retain Policies 21 to 26 as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S213.023	8 Whaitua Te Whanganui-a-Tara	Policy WH.P27: Promoting stream shading.	Amend	Supports progressive shading of streams as part of riparian retirement, planting, bank and streambed protection, not just where nutrient management is insufficient to achieve periphyton TASs.	Remove the qualifier so shading is promoted everywhere.
S213.024	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Amend	Notes greenfield development earthworks decrease visual clarity downstream more than the proposed standard and through the winter period. Seeks stronger and more transparent regulation of sediment discharges. Notes sediment pollution is highly visible and is an interest to catchment groups. Requests (c) amended to require WRC to publish monitoring results and advise community catchment groups of where the results can be found.	Add wording requiring monitoring results are published and community catchment groups are informed where to view them.
S213.025	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Amend	Questions why FEPs or Korokoro Stream part FMU is not required by 2025. Suggests farms of more than 20ha are few with only one in the area impacting downstream water quality. Considers rationale for 2026 date is unclear and sees it as GW giving more time to prepare a FEP whilst requiring private farms to move faster.	Move Korokoro Stream into the 30 December 2025 tranche.
S213.026	8 Whaitua Te Whanganui-a-Tara	Rule WH.R36: Take and use of water exceeding minimum flows or core allocation - prohibited activity.	Support	Seeks GWRC act quickly to set water allocation rules for TWT as Te Awakairangi's low flow in summer is placing pressure on ecological and community values.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S213.027	12 Schedules	Schedule F1: Rivers and lakes with significant indigenous ecosystems.	Support	Confirms presence of lamprey in Speedy's Stream and submitter stated they have an eDNA sample.	Retain as notified
S213.028	12 Schedules	C. Freshwater Action Plans in Whaitua Te Whanganui-a-Tara	Amend	Supports attributes for Korokoro Stream partFMU with addition of deposited fine sediment and fish community health. Unclear why these are excluded given their importance to ecological health to support the diversity, condition and abundance of indigenous fish species including threatened species such as lamprey. Supports 2(a) but seeks a mandatory process for community involvement and add (e) outline community groups, their offered contributions and ways for councils to support them to work collectively onward the FAP objectives.	Retain Schedule, but add deposited fine sediment and fish community health as required attributes for Korokoro part-FMU. Specify a mandatory process for community involvement as envisaged in the Policy. And add **(e) describe the community groups, their offered contributions and any ways councils propose to support them to work collectively toward FAP objectives.**
S213.029	13 Maps	Map 79: Part freshwater management units and target attribute state sites (rivers) - Te Whanganui-a-Tara.	Support	Supports inclusion of Speedys Stream and Dry Creek in the Korokoro part-FMU	Retain as notified
S213.030	13 Maps	Map 89: Unplanned greenfield areas -	Support	Support inclusion of map. Considers it crucial any public or private plan change enabling such development must also propose to change this Plan in order that environmental effects can be fully assessed.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Hutt City Council.			
S213.031	13 Maps	Map 93: Highest and high erosion risk land (Pasture) - Te Whanganui-a-Tara.	Support	Supports mapping and subsequent policies. Notes the mapping underscores importantance for freshwater outcomes.	Retain as notified

S236 Parkvale Road Limited

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S236.001	General comments	General comments - urban development	Oppose	Concerned effects of Plan Change 1 (PC1) is to prohibit residential rezoning of 200 Parkvale Road, and considers requirement of a further plan change to Natural Resources Plan (NRP) for future development is a disproportionate response to the scale of rezoning being sought from the Wellington City Council, and ultimate development yield that might be realised from this site.	Not stated
S236.002	General comments	General comments - current legislation	Oppose	Considers approach by PC1 contrary to directive of NPS-UD	Not stated
S236.003	General comments	General comments - stormwater management	Oppose	Supports need to address stormwater but does not agree with the prohibited activity status and subsequent plan change process. Consider section 32 evaluation has not given consideration to appropriate activity status for management of this activity, nor associated costs.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S236.004	General comments	General comments - current legislation	Oppose	Concerns PC1 gives effect to NPS-FM which if removed, will be out of step with higher order policy direction. Considers this should give Council pause for thought in progressing with PC1.	Not stated
S236.005	2 Interpretation	Unplanned greenfield development	Oppose	Opposes approach towards unplanned greenfield development and subsequent provisions.	Delete the definition of 'Unplanned Greenfield Development'.
S236.006	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	Opposes approach towards unplanned greenfield development and seeks amendments to the policy that still provides for stormwater quality matters to be addressed appropriately.	Amend the policy as follows: Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (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 (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls nonurban development and stormwater discharges to rivers, and (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					Farm Plans) to improve farm practices that impact on freshwater.
S236.007	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Oppose	Opposes approach towards financial contributions under schedule 30 and all associated provisions as it will impact housing affordability and is based on a flat fee basis regardless of catchment, scale of development, consideration of existing environment, or consideration of how effective onsite stormwater treatment may be. Concerned that it is unclear from PC1 provisions how greenfield development is defined for purposes of financial contribution provisions.	Delete the policy
S236.008	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Oppose	Opposed approach towards unplanned greenfield development and considers approach contrary to requirements of NPS-UD, in particular Policies 1(d) and 8. Considers a prohibited activity status a disproportionate response that has been inadequately assessed in section 32 evaluation. Considers requiring a plan change to both a district and regional plan will impose significant costs (E.g. stormwater effects of an area of land of less than 4ha can be appropriately considered and addressed through a resource consent process).	Delete the policy
S236.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Amend	Opposes financial contribution approach as set out in Schedule 30 and all associated provisions.	Delete matter (b) of Rule and make any other necessary consequential amendments in respect of the proposed financial contribution regime.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S236.010	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Opposes approach towards unplanned greenfield development and Rule WH.R13 as a means to give effect to Policy WH.P16.	Delete the rule.
S236.011	12 Schedules	Schedule 30: Financial Contributions.	Oppose	Opposes approach to financial contributions as set out in Schedule 30 and all associated provisions.	Delete Schedule 30.
S236.012	13 Maps	Map 87: Unplanned greenfield areas - Wellington City Council.	Oppose	Opposes approach towards unplanned greenfield development .	Delete the map.

S282 Pat van Berkel

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S282.001	General comments	General comments - overall	Support	No submission point made - to be deleted	Not stated
S282.002	General comments	General comments - water quality improvements	Support	Seeks two recommendations be implemented on behalf of Whaitua Committee, fix water quality problems with pipe network and allow sufficient time to do this work.	Seeks a requirement in the NRP that water quality improvement (through pipe network repairs, etc) be staged and that the timeline be published and updated each year.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S282.003	General comments	General comments - target attribute states	Amend	Supports the 2040 Target Attribute State for e.coli, rather than 2060, stating it is enough time to obtain loans, expand workforces and carry out task.	Retain the TAS (Target Attribute State) for e-coli to reach high quality by 2040.
S282.004	General comments	General comments - overall	Support	Recognises four TA's will be required for PC1 and Whaitua's recommendations and notes addressing water issues in cities is vital.	Not stated
S282.005	General comments	General comments - overall	Amend	Concerned with no mention of the 300ha Mangaroa Peatland.	Include reference to the Mangaroa Peatland in PC1
S282.006	General comments	General comments - definitions	Amend	No definition for 'primary contact'.	Add 'primary contact' definition
S282.007	2 Interpretation	Primary contact sites	Amend	The definition of 'Primary contact sites' refers to Map 85 but Map 85 is not text searchable in the PDF.	Amend so all maps are text searchable Add a text list of the sites in the definition so they are searchable in the document.
S282.008	2 Interpretation	Unplanned greenfield development	Amend	Opposes 'unplanned greenfield development' as it creates an unclear assumption that it applies to land that is developable but is currently unplanned. Supports definition note	Not stated
S282.009	5.1 Air quality rules	General conditions for the discharge of agrichemicals.	Amend	Section 5.1.13 - General conditions for discharge of agrichemicals does not have a rule number	Add a rule number to Section 5.1.13 - General conditions for discharge of agrichemicals
S282.010	8 Whaitua Te Whanganui-a-Tara	Objective WH.O8: Primary contact sites within Te Awa	Oppose	Opposes Objective WH.O8 as it does not require e.coli level improvements by 2040 and omits measures for benthic cyanobacteria or cyanobacteria blooms. It also omits measures of swimmable days which is an easy-to-understand measure for the public.	Amend Objective WH.O8 to remove the words ~~'by ensuring'~~ and replacing them with **'and ensure'.** Amend objective to cover the risk to dogs.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Kairangi/Hutt River, Pākuratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact.		Objective WH.O8 (b) does not cover risk to dogs as 'primary contact' refers to humans. Notes it is likely more people visit river with dogs than those without dogs.	
S282.011	8 Whaitua Te Whanganui-a-Tara	Table 8.3 Primary contact site objectives in rivers.	Amend	Seeks addition of 'swimmable days' as a parameter in Table 8.3 as it easily understood by public and encompasses all quality reasons for why a river is not swimmable. Seeks addition of a benthic cyanobacteria or cyanobacteria blooms measure as a parameter in Table 8.3. Considers this a key measure for Te Awa Kairangi due to toxic algae in the river killing dogs and affecting people.	Add a Parameter in Table 8.3, namely **"Swimmable Days".** Add a Parameter in Table 8.3 which is a measure of benthic cyanobacteria or cyanobacteria blooms.
S282.012	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Amend	Seeks addition of 'swimmable days' as a parameter in Table 8.3 as it easily understood by public and encompasses all quality reasons for why a river is not swimmable.	Add a Parameter in Table 8.4, namely "Swimmable Days".
S282.013	8 Whaitua Te Whanganui-a-Tara	Objective WH.O9: Water quality, habitats, water quantity and ecological processes of rivers	Amend	Supports in part the objective but notes it is incomplete.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		are maintained or improved.			
S282.014	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	Amend	Clauses refer to 'where practicable' or 'where avoidance is not practicable' for contaminant discharges. Concerns developers could claim treatment systems are not practicable (preferring offsetting) when avoiding may be better than offsetting for environmental outcomes. No mention of permeable surfaces.	Add condition to WH.P10 (c): **Where a stormwater treatment system is judged not practicable consider not undertaking the activity.** Add a note to WH.P10 (b): **Water sensitive urban design includes permeable surfaces and rainwater tanks.**
S282.015	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Amend	Clauses refer to 'where practicable' or 'where avoidance is not practicable' for contaminant discharges. Concerns developers could claim treatment systems are not practicable (preferring offsetting) when avoiding may be better than offsetting for environmental outcomes.	Not stated
S282.016	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Notes that impervious surfaces are assumed and there is no requirement for permeable surfaces.	Add a new condition WH.P14 (a): **include permeable surfaces where possible (eg, for minor roads, carparks, footpaths).**
S282.017	8 Whaitua Te	Policy WH.P15:	Amend	Offsets may be used as a way of avoiding managing contaminants.	Add a note explaining how such avoidance is discouraged.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	Stormwater contaminant offsetting for new greenfield development.			
S282.018	8 Whaitua Te Whanganui-a-Tara	Rule WH.R33: Take and use of water in the Whaitua Te Whanganui-a Tara - restricted discretionary activity.	Amend	Notes Te Whanganui-a-Tara Whaitua Committee, recommends gradually raising the minimum flow of Te Awa Kairangi, Orongorongo and Wainuiomata rivers to 80% of MALF (mean annual low flow) over a 50 year period. At present the minimum flow of Te Awa Kairangi is at 30% of MALF.	Add to these rules the gradual changes in minimum flow that are required between 2021 (when the recommendation was accepted by Greater Wellington) and 2071
S282.019	8 Whaitua Te Whanganui-a-Tara	Rule WH.R34: Take and use of water in the Whaitua Te Whanganui-a-Tara - discretionary activity.	Amend	Notes Te Whanganui-a-Tara Whaitua Committee, recommends gradually raising the minimum flow of Te Awa Kairangi, Orongorongo and Wainuiomata rivers to 80% of MALF (mean annual low flow) over a 50 year period. At present the minimum flow of Te Awa Kairangi is at 30% of MALF.	Add to these rules the gradual changes in minimum flow that are required between 2021 (when the recommendation was accepted by Greater Wellington) and 2071
S282.020	13 Maps	Map 85: Primary contact sites - Te	Amend	Notes that Map 85 omits the primary contact site "Whakatikei River at Hutt Confluence	Add site "Whakatikei River at Hutt Confluence" to Map 85 (and to a text list of the definition of Primary contact sites.)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Whanganui-a-Tara.			
S282.021	13 Maps	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Support	Supports Map 88 excluding the southern growth area	Not stated

S016 Pauatahanui Residents Association

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S16.001	General comments	General comments - consultation	Not Stated	Considers not sufficient time or consultation with the community for landowners to consider the implications of the policies and rules.	Not stated
S16.002	General comments	General comments - maps	Not Stated	Considers the maps in PC1 make it difficult for property owners to work out how they might be affected.	Not stated
S16.003	General comments	General comments - overall	Not Stated	Concerns regarding modelling to inform the policies and rules rather than collecting data and 'ground truthing' and then applying appropriate actions	Not stated
S16.004	General comments	General comments - overall	Not Stated	Concerns regarding implementation of the plan, and concerns about the financial and time cost to landowners.	Not stated
S16.005	General comments	General comments - overall	Not Stated	Concerned that poor implementation will penalise those engaging proactively and using good management practices while failing to identify or deal with those engaging in poor management practices.	Not stated
S16.006	General comments	General comments - overall	Not Stated	Considers better outcomes would be achieved if PC1 was weighted in accordance with Recommendations 58, 59, 60, 61 and 64 of Te	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Awarua-o-Porirua Whaitua Implementation Programme, focusing on resourcing support and actions rather than on enforcement.	
S16.007	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Support	Considers achieving the objectives of the Natural Resources Plan and of Plan Change 1, rural landowners are supported through measures that include, but are not limited to, those outlined in Method 44.	Retain Method M44
S16.008	9 Te Awarua-o-Porirua Whaitua	9.1 Objectives	Support	Supports the objectives that seek to progressively improve the health of Te Awarua-o-Porirua's groundwater, streams, wetlands and coastal marine environment.	Retain the Objectives
S16.009	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	Concerned that regulatory methods can lead to perverse outcomes, including intensification as rural landowners may choose to subdivide to smaller block sizes to maximise a return.	~~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
S16.010	9 Te Awarua-o-Porirua Whaitua	Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Amend	Considers the emphasis should be on positive actions rather than on regulatory methods to achieve better outcomes through collaboration and support.	Wellington Regional Council shall, in partnership with mana whenua, prepare and deliver Freshwater Action Plans in accordance with Schedule 27 (Freshwater Action Plan). The first iteration of Freshwater Action Plans, to cover all rivers and lakes in Te Awarua-o-Porirua Whaitua, shall be completed by December 2026. Freshwater Action Plans shall identify, in detail, the actions in detail, the actions, ~~including to support effective regulation,~~ to achieve the target attribute states, and support relevant environmental outcomes, set in this Plan.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S16.011	9 Te Awarua-o-Porirua Whaitua	Rule P.R16: Vegetation clearance on highest erosion risk land-permitted activity.	Amend	There are many different pest plants within the region with different effects on native vegetation.	Provide definition for pest plants
S16.012	9 Te Awarua-o-Porirua Whaitua	Rule P.R27: The use of land for farming activities - discretionary activity.	Oppose	Considers it should be possible to demonstrate at a property level whether target attribute states are exceeded and if the property activities are not contributing to an increase, then a change in land use should be permitted.	Amend provision to allow a property scale response.

S215 Paul Persico

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S215.001	General comments	General comments - economic cost/impact	Oppose	Considers PC1 will create a problem and financial burden for lifestyle property owners in Mangaroa and Akatarawa areas, but will achieve nothing as no problem exists. Considers PC1 will be a huge cost to rate payers and the money would be better of spent finding the source of the problem and rectifying it. Agrees with the Maymorn Collective Submission in all aspects.	Not Stated

S251 Peka Peka Farm Limited

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S251.001	General comments	General comments - unplanned greenfield development	Oppose	Opposes the approach for providing unplanned greenfield development as a prohibited activity and considers it contrary to NPS-UD. In particular, Objective 2, Objective 6 (c), Policy 1 (d) and Policy 8 and 8 (a). Considers unplanned greenfield development as a prohibited activity is fundamentally at odds with the requirement of NPS-UD to be responsive to unanticipated or out of sequence development and to support the competitive operation of land and development markets. Considers it will add significant costs which have not been appropriately assessed in Section 32 report. Considers insufficient assessment of prohibited activity status has been had compared to use of non-complying or discretionary activity status. Opposes targeted approach intended to preclude 'unplanned' greenfield development.	Not stated
S251.002	General comments	General comments – urban development	Oppose	Opposes financial contribution proposed by PC1. Considers an approach will impact housing affordability, is one-size fits all, does not account for site specific approaches and ignores opportunities to comprehensively treat stormwater (eg. Extensive wetlands).	Not stated
S251.003	General comments	General comments - current legislation	Oppose	Concerns the replacement of the NPS-FM creates uncertainty where higher order policy PC1 is giving effect to is subject to change. PC1 already takes a more restrictive position than what the NPS-FM and is further out of step with the higher order policy it is seeking to give effect to.	Not stated
S251.004	2 Interpretation	Unplanned greenfield	Oppose	Opposes approach towards unplanned greenfield development and requests deletion of definition.	Delete the definition: ~~Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		development			~~which also require an underlying zone change (from rural/nonurban/ open space to urban) though a District Plan change to enable the development. Note: Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023.~~
S251.005	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	Opposes approach towards unplanned greenfield development and requests amendments whilst still providing for stormwater quality matters to be addressed appropriately. Requests amendment that addresses opposition to the proposed financial contribution regime.	Amend the policy as follows: Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: ~~(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~~ (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers, and (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S251.006	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Oppose	Opposes financial contribution approach as set out in proposed Schedule 30 and all associated provisions.	Delete the policy. ~~Policy WH.P15: Stormwater contaminant offsetting for new greenfield development. The adverse effects of residual (post-treatment) stormwater contaminants from new greenfield development, roads (not already captured as part of a greenfield development) and state highways where the discharge will enter a surface water body or coastal water, including via an existing or new stormwater network, are to be offset by way of a financial contribution in accordance with Schedule 30 (financial contribution).~~
S251.007	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Oppose	Opposes approach towards unplanned greenfield development. Considers approach is inconsistent with the NPS-UD, and in particular Objectives 2 and 6(c), and Policies 1(d) and 8. Considers the proposed prohibited activity status has been inadequately assessed in the section 32 evaluation. Considers a plan change to both a district and regional plan will impose significant costs and is inconsistent with the requirement to be responsive to proposals that would provide for significant development capacity, and support the competitive operation of land and development markets.	Delete the policy: ~~Policy WH.P16: Stormwater discharges from new unplanned greenfield development~~ ~~Avoid all new stormwater discharges from unplanned greenfield development where the discharge will enter a surface water body or coastal water, including through an existing local authority stormwater network.~~
S251.008	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Amend	Opposes financial contribution approach as set out in proposed Schedule 30 and all associated provisions.	Delete matter (b) of the Rule and make any other necessary consequential amendments in respect of the proposed financial contribution regime: Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity. The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not permitted by Rule

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					WH.R5, or a controlled activity under Rule WH.R6 or Rule WH.R7, or prohibited under WH.R13 is a discretionary activity provided the following conditions are met: (a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), and ~~(b) if the proposal is for greenfield development a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions)..~~
S251.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Opposes approach towards unplanned greenfield development. Opposes Rule WH.R13 as a means to give effect to Policy WH.P16 and seeks its deletion.	Delete Rule WH.R13: ~~Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity~~ ~~The use of land and the associated discharge of stormwater from impervious surfaces from unplanned greenfield development direct into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or proposed stormwater network, is a prohibited activity.~~
S251.010	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	Opposes approach towards unplanned greenfield development and requests amendments whilst still providing for stormwater quality matters to be addressed appropriately. Requests amendment that addresses opposition to the proposed financial contribution regime.	Amend the policy as follows: Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (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 (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					(c) imposing hydrological controls on urban development and stormwater discharges to rivers, and (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.
S251.011	9 Te Awarua-o-Porirua Whaitua	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Oppose	Opposes financial contribution approach as set out in proposed Schedule 30 and all associated provisions.	Delete Policy P.P14. ~~The adverse effects of residual (post-treatment) stormwater contaminants from new greenfield development, roads (not already captured as part of a greenfield development) and state highways where the discharge will enter a surface water body or coastal water, including via an existing or new stormwater network, are to be offset by way of a financial contribution in accordance with Schedule 30 (financial contribution).~~
S251.012	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Oppose	Opposes approach towards unplanned greenfield development. Considers approach is inconsistent with the NPS-UD, and in particular Objectives 2 and 6(c), and Policies 1(d) and 8. Considers the proposed prohibited activity status has been inadequately assessed in the section 32 evaluation. Considers a plan change to both a district and regional plan will impose significant costs and is inconsistent with the requirement to be responsive to proposals that would provide for significant development capacity, and support the competitive operation of land and development markets.	Delete Policy P.P15: ~~Policy P.P15: Stormwater discharges from new unplanned greenfield development. Avoid all new stormwater discharges from unplanned greenfield development where the discharge will enter a surface water body or coastal water, including through an existing local authority stormwater network.~~ ~~Note~~ ~~Any unplanned greenfield development proposals will require a plan change to the regional plan alongside any required plan change to rezone land within the relevant district plan.~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S251.013	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Amend	Opposes financial contribution approach as set out in proposed Schedule 30 and all associated provisions.	Delete matter (b) of the Rule and make any other necessary consequential amendments in respect of the proposed financial contribution regime: Rule P.R10: Stormwater from new and redeveloped impervious surfaces - discretionary activity. The use of land for the creation of new or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including via an existing local authority stormwater network, that is not permitted by Rule P.R5, or a controlled activity under Rule P.R6 or Rule P.R7, or prohibited under P.R12 is a discretionary activity provided the following conditions are met: (a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), and ~~(b) if the proposal is for greenfield development, a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions).~~
S251.014	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Oppose	Opposes approach towards unplanned greenfield development and opposes Rule P.R12 as a means to give effect to Policy P.P15.	Delete Rule P.R12: ~~Rule P.R12: Stormwater from new unplanned greenfield development - prohibited activity. The use of land and the associated discharge of stormwater from impervious surfaces from unplanned greenfield development direct into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or proposed stormwater network, is a prohibited activity.~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S251.015	12 Schedules	Schedule 30: Financial Contributions.	Oppose	Opposes financial contribution approach as set out in proposed Schedule 30 and all associated provisions.	Delete Schedule 30.
S251.016	13 Maps	Map 86: Unplanned greenfield areas - Porirua City Council.	Oppose	Opposes approach to unplanned greenfield development and seeks deletion of map forming part of provisions opposed.	Delete the map.
S251.017	13 Maps	Map 87: Unplanned greenfield areas - Wellington City Council.	Oppose	Opposes approach to unplanned greenfield development and seeks deletion of map forming part of provisions opposed.	Delete the map.
S251.018	13 Maps	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Oppose	Opposes approach to unplanned greenfield development and seeks deletion of map forming part of provisions opposed.	Delete the map.
S251.019	13 Maps	Map 89: Unplanned greenfield areas - Hutt City Council.	Oppose	Opposes approach to unplanned greenfield development and seeks deletion of map forming part of provisions opposed.	Delete the map.

S280 Peter Handford

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S280.001	General comments	General comments - overall	Not Stated	Considers focus of PC1 should be achieving environmental outcomes, not prescriptive blanket removal of land uses from particular areas	Not stated.
S280.002	General comments	General comments - plantation forestry	Not Stated	Considers forestry management can be applied where this a strong focus on environmental outcomes such as soil and water protection and biodiversity	Not stated.
S280.003	General comments	General comments - plantation forestry	Not Stated	Concerns PC1 creates blanket exclusion for forestry rather than set out measurable outcomes across all land uses with identified monitoring approaches	Not stated.
S280.004	General comments	General comments - plantation forestry	Not Stated	Concerns PC1 creates a blanket exclusion for "highest erosion risk" areas without recognising range of forest management options. Considers this removes potential for forest management to of provide ecosystem services including biodiversity, carbon sequestration, soil and water protection and recreation. Considers Innovative and environmentally sensitive forest management approaches should be facilitated and encouraged as low impact forestry management is possible without negative impacts	Not stated.

S054 Peter Kiernan

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S54.001	General comments	General comments - overall	Not Stated	Supports the New Zealand Farm Forestry Association Inc, and the New Zealand Farm	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Forestry Association's Wellington branch submissions	
S54.002	General comments	General comments - economic cost/impact	Oppose	Concerned the decisions of the proposed plan change could be rolled out on the Kapiti Coast - where the submitter resides. Concerned the extra costs associated with consultant and resource consent fees will make forestry uneconomical. Believes that rules governing forestry in PC1 would render interest in land incapable of reasonable use citing section 85 of the RMA.	Ensure that if national standards are followed forestry harvesting be a Permitted Activity under the plan
S54.003	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Not Stated	Considers that without local scientific data that changes to the forestry rules are not justified.	Not Stated
S54.004	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry - discretionary activity.	Not Stated	Considers that without local scientific data that changes to the forestry rules are not justified.	Not Stated
S54.005	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.	Not Stated	Considers that without local scientific data that changes to the forestry rules are not justified.	Not Stated
S54.006	General comments	General comments – plantation forestry	Oppose	Considers that without local scientific data that changes to the forestry rules are not justified.	Not stated

S203 Peter Thomson

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S203.001	General comments	General comments - overall	Not Stated	Supports the submission of Robert Anker	Not stated
S203.002	General comments	General comments - overall	Not Stated	Notes PC1 changes are largely drawn from, or a result of, the direction stated in the NPS-FM for Freshwater Management and that the Government has committed to replacing the NPS- FM. Considers it is inappropriate and a waste of ratepayers money to commit to the implementation / adoption of the Natural Resources Plan as the Government has indicated that the NPS FM will be replaced.	Withdraw PC1 until the new National Policy Statement for Freshwater Management has been released.
S203.003	General comments	General comments - rural	Not Stated	Notes the majority of rural landscape is bush and plantation forest and the vast majority of the water catchment in Upper Hutt is publicly owned. Notes the Section 32 report (Section 6.9 Sources of nitrogen and other contaminants) notes that stocking rates are low, even for the classes of land grazed and that absolute stock numbers are low. Notes presence of wild animals, deer and wild pigs in the region and on GWRC and DOC land, considers the animals likely to cause contamination of fresh water will be dominated by wild deer and pigs on GRWC's own land. Considers that GWRC do not have good practices for fresh water management on their land and suggests the impact of livestock is not material in respect to the quality of the fresh water in Upper Hutt.	Remove stocking rates specifically for Amendments to Chapter 8 - Whaitua Te Whanganui-a-Tara.

S018 PF Olsen Ltd

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S18.001	2 Interpretation	Afforestation	Support	Supports consistency with higher order documents i.e. NES-CF	Retain as notified
S18.002	2 Interpretation	Earthworks	Amend	Concerned with having different definitions for earthworks and seeks consistency within legislation. Seeks clarification on if earthworks rules apply for forestry earthworks outside of Rules WR.20, WR.21, WH.R22, P.R19, P.R20 and P.R21.	Amend the definition of Earthworks to provide consistency. Exclude forestry earthworks from earthworks rules.
S18.003	2 Interpretation	Harvesting	Support	Supports consistency with higher order documents i.e. NES-CF	Retain as notified
S18.004	2 Interpretation	Highest erosion risk land (plantation forestry)	Oppose	Considers that there is more research available to determine landslide by susceptibility, citing recent New Zealand research.	Delete the mapping layer or have it peer reviewed to establish its scientific validity.
S18.005	2 Interpretation	Highest erosion risk land (pasture)	Oppose	Considers that there is more research available to determine landslide by susceptibility, citing recent New Zealand research.	Delete the mapping layer or have it peer reviewed to establish its scientific validity.
S18.006	2 Interpretation	Highest erosion risk land (woody vegetation)	Oppose	Seeks more comprehensive information regarding the highest erosion risk for woody vegetation. Considers that the supporting technical report accompanying the mapping system is inadequate to substantiate any provisions in PC1.	Delete this definition
S18.007	2 Interpretation	Mechanical land preparation	Support	Supports consistency with higher order documents i.e. NES-CF	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S18.008	2 Interpretation	Replanting	Support	Supports consistency with higher order documents i.e. NES-CF	Retain as notified
S18.009	2 Interpretation	Stabilisation	Amend	Seeks consistency across the plan. Seeks clarification on if the definition applies for forestry earthworks.	Amend to clarify definition across the entire plan. Exclude earthworks for forestry from this definition. For plantation forestry, default to the NES-CF.
S18.010	2 Interpretation	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)	Support	Supports consistency with higher order documents i.e. NES-CF	Retain as notified
S18.011	3 Objectives	Objective O18: Rivers, lakes, natural wetlands and coastal water are suitable for contact recreation and Māori customary use.	Amend	Notes the NPS-FM recognises Maori Customary uses as a significant attribute that should be uniformly upheld throughout the entire region	Amend the provision to be consistent across the region.
S18.012	4 Policies	Policy P36: Restoring Wairarapa Moana	Oppose	Notes the significance of adhering to legislative principles to ensure changes are effective, clear and fair, and that language should be used that allows adaptability to changing circumstances. Considers the use of "restore" or "avoid" inappropriate, as they do not allow adaptability to changing circumstances.	Amend to change the word restore for the aim of restoring the ecological health and significant values of Wairapara Moana.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S18.013	5.4 Beds of lakes and rivers	5.4.4 Uses of beds of lakes and rivers general conditions.	Amend	Concerned with financial implications of (n) for forestry activities, noting that the s32 report states that economic impact will be low to moderate. States that the NES-CF has not been considered, namely with management plan requirements.	Amend to exclude forestry activities of compliance with the general condition (n).
S18.014	6 Other methods	Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	Concerned there is no provision for independent review or peer review.	Amend to include that an independent body will do the report, which should be peer-reviewed for its validity.
S18.015	6 Other methods	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-	Amend	Seeks reports are independently reviewed or peer reviewed.	Amend to include that an independent body will do the report , which should be peer-reviewed for its validity.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Porirua Whaitua.			
S18.016	6 Other methods	Method M41: Identifying and responding to degradation in freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Not Stated	Seeks reports are independently reviewed or peer reviewed.	Amend to include that an independent body will do the report , which should be peer-reviewed for its validity.
S18.017	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved	Amend	Questions the meaning and assessment of "natural state". Considers that the impact of population growth on water resources should be taken into account.	Amend this provision to delete the natural state and include the best freshwater quality possible according to the receiving environment.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and is wai ora by 2100.			
S18.018	8 Whaitua Te Whanganui-a-Tara	Objective WH.O5: By 2040 the health and wellbeing of the Parangarahu Lakes and associated natural wetlands are on a trajectory of improvement towards wai ora.	Amend	Seeks amendment of the provision based on the submitters comments on Table 8.2.	Amend the provision to based on a suitable table consistent with NPS-FM.
S18.019	8 Whaitua Te Whanganui-a-Tara	Table 8.2 Target attribute states for lakes.	Amend	Considers the setting of the proposed target attribute states has not been consistent with 3.11(8) of the NPS-FM. Considers there is a lack of due consideration given to the environmental outcomes, target attribute states of receiving environments, and connections between water bodies, as required by the clause. Questions the effectiveness of the proposed target attribute states 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 target attribute states and emphasises the importance of accurate and up-to-date information.	Revise target attribute states in accordance with Clause 3.11(8) of the NPS-FM.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S18.020	8 Whaitua Te Whanganui-a-Tara	Table 8.3 Primary contact site objectives in rivers.	Amend	Considers the setting of the proposed target attribute states has not been consistent with 3.11(8) of the NPS-FM. Considers there is a lack of due consideration given to the environmental outcomes, target attribute states of receiving environments, and connections between water bodies, as required by the clause. Questions the effectiveness of the proposed target attribute states 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 target attribute states and emphasises the importance of accurate and up-to-date information.	Revise target attribute states in accordance with Clause 3.11(8) of the NPS-FM.
S18.021	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Amend	Considers the setting of the proposed target attribute states has not been consistent with 3.11(8) of the NPS-FM. Considers there is a lack of due consideration given to the environmental outcomes, target attribute states of receiving environments, and connections between water bodies, as required by the clause. Questions the effectiveness of the proposed target attribute states 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 target attribute states and emphasises the importance of accurate and up-to-date information.	Revise target attribute states in accordance with Clause 3.11(8) of the NPS-FM.
S18.022	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal	Amend	Seeks clarification on the purpose of target attribute states which regulate forestry activities. 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	Exclude forestry activities.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		water objectives.		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.	
S18.023	8 Whaitua Te Whanganui-a-Tara	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Amend	Considers consultation with scientific experts, the community, and primary industries will ensure comprehensive decision-making.	Amend to seek partnership with mana whenua, the local community and primary industry.
S18.024	8 Whaitua Te Whanganui-a-Tara	Policy WH.P4: Achievement of the visual clarity target attribute states.	Amend	Seeks amendment of the provision based on the submitter's own submission on Table 8.4.	Amend to incorporate a new Table in accordance with feedback provided on Table 8.4

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S18.025	8 Whaitua Te Whanganui-a-Tara	Table 8.5: Sediment load reductions required to achieve the visual clarity target attribute states.	Amend	Considers the setting of the proposed target attribute states has not been consistent with 3.11(8) of the NPS-FM. Considers there is a lack of due consideration given to the environmental outcomes, target attribute states of receiving environments, and connections between water bodies, as required by the clause. Questions the effectiveness of the proposed target attribute states 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 target attribute states and emphasises the importance of accurate and up-to-date information.	Revise target attribute states in accordance with Clause 3.11(8) of the NPS-FM.
S18.026	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	Considers that there is a discrepancy between rules for farming compared to forestry activities on erosion prone land, noting that there is a process in place for farming activities to enable gradual compliance without jeopardising land use, but that forestry is subject to stringent policy which mandates the retirement of forestry in high erosion-risk land. Considers that farming activities are given preferential treatment over forestry without appropriate scientific evidence which hinders the growth of both sectors. Considers approach poses disadvantages to the forestry sector resulting in financial burdens, limited resource access, and reduced growth opportunities, ultimately impeding rural development. Also suggests this approach leads to imbalanced land use, diminished freshwater quality and soil degradation.	Greater consistency of rules between farming and forestry.
S18.027	8 Whaitua Te Whanganui-a-Tara	Policy WH.P25: Managing rural land	Oppose	Considers limitations on land use are too restrictive and may result in adverse economic effects. Seeks that the policy is reviewed with consideration for the following: - Scientific evidence	Delete provision, or redraft in accordance with feedback given

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		use change.		- Flexibility for case-by-case evaluations, consideration of specific circumstances, and the potential for innovative and sustainable land use practices - Economic impact assessment - Community engagement - Mechanisms for ongoing monitoring and adaptive management.	
S18.028	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Oppose	Considers the prohibition of forestry activities in high erosion areas is too restrictive, resulting in economic burden and triggering liabilities under the ETS. Seeks greater alignment with the NES-CF and a more scientific approach in formulating forestry regulations. Seeks for the consideration of positive effects of well-managed forests on water quality and biodiversity. Considers there is preferential leniency towards farming practices over forestry activities which contradicts scientific evidence and obstructs the growth of both sectors. Considers retirement rules for forestry need a scientific foundation and the effects of forestry on sedimentation be reevaluated. Considers retirement rules for forestry need a scientific foundation and the effects of forestry on sedimentation be reevaluated. Seeks a more detailed analysis of the economic impact of the proposed retirement rules on the forestry sector. Notes section 85(1) of the Resource Management Act (RMA) prohibits provisions that deem land unusable or injuriously affected without justification	Delete policy
S18.029	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Amend	Seeks clarification on if the policy applies for forestry earthworks. Considers that forestry earthworks should be managed under the NES-CF by default.	Clarify if the policy applies to forestry earthworks.
S18.030	8 Whaitua Te	Policy WH.P30: Discharge	Amend	Seeks clarification on if discharge standards for earthworks apply to forestry earthworks. Considers that additional restrictions are unnecessary in light	Clarify if the policy applies to forestry earthworks.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	standard for earthworks.		of the NES-CF, unless evaluated under s32(4) of the RMA.	
S18.031	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose	Considers that the proposed winter shutdown for earthworks will have significant economic burdens for construction projects. Seeks for an economic impact assessment to be undertaken. Seeks for alternative mitigation measures to be implemented for essential earthworks, rather than a blanket prohibition. Seeks flexibility to allow for case-by-case evaluations based on project-specific circumstances. Seeks alignment with national standards, to balance environmental protection with the facilitation of essential construction activities.	Delete provision
S18.032	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity.	Amend	Considers existing vegetation clearance rules under the NES-CF are sufficient. Seeks greater alignment with the NES-CF and a more scientific approach. Seeks for the consideration of positive effects of well-managed forests on water quality and biodiversity.	Amend this rule to default to the NES-CF standards for vegetation clearance.
S18.033	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land - controlled activity.	Amend	Considers existing vegetation clearance rules under the NES-CF are sufficient. Seeks greater alignment with the NES-CF and a more scientific approach. Seeks for the consideration of positive effects of well-managed forests on water quality and biodiversity.	Amend this rule to default to the NES-CF standards for vegetation clearance.
S18.034	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry -	Oppose	Concerned the activity status for forestry activities for Whaitua Te Whanganui-a-Tara bypasses the NES-CF. Concerned that PC1 rules do not align with the recommendations of the Te Awarua-o-Porirua Whaitua Implementation Programme and is	Amend to recognise permitted activity status from the NES-CF.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		controlled activity.		concerned about the coherence and appropriateness of the proposed forestry regulations. Considers that the assessment methodology for the s32 report (Greer, 2023a and 2023b) is insufficient to demonstrate the effectiveness of the proposed forestry rules, due to the lack of a peer-review, and flawed evaluation of retirement, space planting, and riparian management rules based on farming activities. Concerned that there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not. Considers that pastoral systems are treated preferentially to forestry and questions the scientific basis of the proposed regulations. Cites a study which highlights the positive impact of trees on water quality, and suggests that forests provide water storage during winter and release rainfall gradually, which mitigates downstream flooding. Seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-managed forests.	
S18.035	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry - discretionary activity.	Amend	Concerned the activity status for forestry activities for Whaitua Te Whanganui-a-Tara bypasses the NES-CF. Concerned that PC1 rules do not align with the recommendations of the Te Awarua-o-Porirua Whaitua Implementation Programme and is concerned about the coherence and appropriateness of the proposed forestry regulations. Considers that the assessment methodology for the s32 report (Greer, 2023a and 2023b) is insufficient to demonstrate the effectiveness of the proposed forestry rules, due to the lack of a peer-review, and flawed evaluation of retirement, space planting, and riparian management rules based on farming activities. Concerned that there is a presumption that forestry	Amend activity status to controlled, with criteria that can be met by landowners.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				activities are a significant cause of sedimentation, citing studies which suggest that they do not. Considers that pastoral systems are treated preferentially to forestry and questions the scientific basis of the proposed regulations. Cites a study which highlights the positive impact of trees on water quality, and suggests that forests provide water storage during winter and release rainfall gradually, which mitigates downstream flooding. Seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-managed forests.	
S18.036	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.	Oppose	Concerned the activity status for forestry activities for Whaitua Te Whanganui-a-Tara bypasses the NES-CF. Concerned that PC1 rules do not align with the recommendations of the Te Awarua-o-Porirua Whaitua Implementation Programme and is concerned about the coherence and appropriateness of the proposed forestry regulations. Considers that the assessment methodology for the s32 report (Greer, 2023a and 2023b) is insufficient to demonstrate the effectiveness of the proposed forestry rules, due to the lack of a peer-review, and flawed evaluation of retirement, space planting, and riparian management rules based on farming activities. Concerned that there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not. Considers that pastoral systems are treated preferentially to forestry and questions the scientific basis of the proposed regulations. Cites a study which highlights the positive impact of trees on water quality, and suggests that forests provide water storage during winter and release rainfall gradually, which mitigates downstream flooding. Seeks that the proposed rules, particularly those	Delete the provision

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				that restrict tree planting near water bodies, recognise the positive contributions of well-managed forests.	
S18.037	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	Seeks clarification on if the rule applies to forestry earthworks.	Amend to default to NES-CF concerning forestry earthworks.
S18.038	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	Seeks clarification on if the rule applies to forestry earthworks.	Amend to default to NES-CF concerning forestry earthworks.
S18.039	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Amend	Seeks clarification on if the rule applies to forestry earthworks.	Amend to default to NES-CF concerning forestry earthworks.
S18.040	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Amend	Considers there is preferential leniency towards farming practices over forestry activities which disadvantages the forestry sector. Considers the approach obstructs the growth of both sectors and presents challenges for water quality. Considers the approach contradicts scientific evidence, leading to adverse social and economic consequences. Considers that farming activities should be subject to similar retirement rules as forestry activities.	Greater consistency of rules between farming and forestry.
S18.041	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities	Amend	Considers there is preferential leniency towards farming practices over forestry activities which disadvantages the forestry sector. Considers the approach obstructs the growth of both sectors and	Greater consistency of rules between farming and forestry.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		on 20 hectares or more of land - permitted activity.		presents challenges for water quality. Considers the approach contradicts scientific evidence, leading to adverse social and economic consequences. Considers that farming activities should be subject to similar retirement rules as forestry activities.	
S18.042	8 Whaitua Te Whanganui-a-Tara	Table 8.6: Phase-in of farm environment plans for part Freshwater Management Units.	Oppose	Considers there is preferential leniency towards farming practices over forestry activities which disadvantages the forestry sector. Considers the approach obstructs the growth of both sectors and presents challenges for water quality. Considers the approach contradicts scientific evidence, leading to adverse social and economic consequences. Considers that farming activities should be subject to similar retirement rules as forestry activities.	Delete Table 8.6
S18.043	9 Te Awarua-o-Porirua Whaitua	Objective P.O1: The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai	Amend	Concerned with the ambiguity of the meaning of natural state. Considers that the impact of population growth on water resources should be taken into account.	Amend this provision to delete the natural state and include the best freshwater quality possible according to the receiving environment.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		ora by 2100.			
S18.044	9 Te Awarua-o-Porirua Whaitua	Objective P.O6: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Amend	Seeks amendment of the provision based on the submitter's own submission on Table 9.2.	Amend the provision to be based on a suitable table consistent with NPS-FM
S18.045	9 Te Awarua-o-Porirua Whaitua	Table 9.2: Target attribute states for rivers.	Amend	Considers the setting of the proposed target attribute states has not been consistent with 3.11(8) of the NPS-FM. Considers there is a lack of due consideration given to the environmental outcomes, target attribute states of receiving environments, and connections between water bodies, as required by the clause. Questions the effectiveness of the proposed target attribute states 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 target attribute states and emphasises the importance of accurate and up-to-date information.	Revise target attribute states in accordance with Clause 3.11(8) of the NPS-FM.
S18.046	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target	Amend	Seeks clarification on the purpose of target attribute states which regulate forestry activities. 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	Exclude forestry activities.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		attribute states and coastal water objectives.		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.	
S18.047	9 Te Awarua-o-Porirua Whaitua	Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Amend	Considers consultation with scientific experts, the community, and primary industries will ensure comprehensive decision-making.	Amend to seek partnership with mana whenua, the local community and primary industry.
S18.048	9 Te Awarua-o-Porirua Whaitua	Policy P.P4: Contaminant load reductions.	Amend	Seeks amendment of the provision based on the submitter's own submission on Table 9.1 and Table 9.3.	Amend to incorporate a new Table of contaminants load reduction.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S18.049	9 Te Awarua-o-Porirua Whaitua	Table 9.3: Harbour arm catchment contaminant load reductions.	Support	Considers the setting of the proposed target attribute states has not been consistent with 3.11(8) of the NPS-FM. Considers there is a lack of due consideration given to the environmental outcomes, target attribute states of receiving environments, and connections between water bodies, as required by the clause. Questions the effectiveness of the proposed target attribute states 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 target attribute states and emphasises the importance of accurate and up-to-date information.	Revise target attribute states in accordance with Clause 3.11(8) of the NPS-FM.
S18.050	9 Te Awarua-o-Porirua Whaitua	Table 9.4: Part Freshwater Management Unit sediment load reductions required to achieve the visual clarity target attribute state.	Amend	Considers that the setting of the proposed target attribute states has not been consistent with 3.11(8) of the NPS-FM. Considers there is a lack of due consideration given to the environmental outcomes, target attribute states of receiving environments, and connections between water bodies, as required by the clause. Questions the effectiveness of the proposed target attribute states 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 target attribute states and emphasises the importance of accurate and up-to-date information.	Revise target attribute states in accordance with Clause 3.11(8) of the NPS-FM.
S18.051	9 Te Awarua-o-Porirua Whaitua	Policy P.P20: Managing diffuse discharges of nutrients and	Amend	Considers that there is a discrepancy between rules for farming compared to forestry activities on erosion prone land, noting that there is a process in place for farming activities to enable gradual compliance without jeopardising land use, but that forestry is subject to stringent policy which mandates the retirement of forestry in high erosion-risk land.	Amend to include the retirement of farming activity in high-risk erosion land (pasture) and highest erosion-risk land (pasture).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Escherichia coli from farming activities.		Considers that farming activities are given preferential treatment over forestry without appropriate scientific evidence which hinders the growth of both sectors. Considers approach poses disadvantages to the forestry sector resulting in financial burdens, limited resource access, and reduced growth opportunities, ultimately impeding rural development. Also suggests this approach leads to imbalanced land use, diminished freshwater quality and soil degradation.	
S18.052	9 Te Awarua-o-Porirua Whaitua	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	Considers there is a discrepancy between rules for farming compared to forestry activities on erosion prone land, noting that there is a process in place for farming activities to enable gradual compliance without jeopardising land use, but that forestry is subject to stringent policy which mandates the retirement of forestry in high erosion-risk land. Considers that farming activities are given preferential treatment over forestry without appropriate scientific evidence which hinders the growth of both sectors. Considers approach poses disadvantages to the forestry sector resulting in financial burdens, limited resource access, and reduced growth opportunities, ultimately impeding rural development. Also suggests this approach leads to imbalanced land use, diminished freshwater quality and soil degradation.	Amend to include the retirement of farming activity in high-risk erosion land (pasture) and highest erosion-risk land (pasture).
S18.053	9 Te Awarua-o-Porirua Whaitua	Policy P.P24: Managing rural land use change.	Oppose	Considers limitations on land use are too restrictive and may result in adverse economic effects, particularly clause (b). Seeks that the policy is reviewed with consideration for the following: - Scientific evidence - Flexibility for case-by-case evaluations, consideration of specific circumstances, and the potential for innovative and sustainable land use practices - Economic impact assessment - Community engagement -	Delete provision, or redraft in accordance with feedback given

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Mechanisms for ongoing monitoring and adaptive management.	
S18.054	9 Te Awarua-o-Porirua Whaitua	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Oppose	Considers the prohibition of forestry activities in high erosion areas is too restrictive, resulting in economic burden and triggering liabilities under the ETS. Seeks greater alignment with the NES-CF and a more scientific approach in formulating forestry regulations. Seeks for the consideration of positive effects of well-managed forests on water quality and biodiversity. Considers there is preferential leniency towards farming practices over forestry activities which contradicts scientific evidence and obstructs the growth of both sectors. Considers retirement rules for forestry need a scientific foundation and the effects of forestry on sedimentation be reevaluated. Considers retirement rules for forestry need a scientific foundation and the effects of forestry on sedimentation be reevaluated. Seeks a more detailed analysis of the economic impact of the proposed retirement rules on the forestry sector. Notes section 85(1) of the Resource Management Act (RMA) prohibits provisions that deem land unusable or injuriously affected without justification	Delete the policy
S18.055	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Amend	Seeks clarification on if the policy applies for forestry earthworks. Considers that the policy should not apply to forestry earthworks as it is already managed under the NESC-CF.	State that the policy does not apply to forestry earthworks.
S18.056	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Amend	Seeks clarification on if the policy applies for forestry earthworks. Considers that the policy should not apply to forestry earthworks as it is already managed under the NESC-CF.	State that the policy does not apply to forestry earthworks.
S18.057	9 Te Awarua-	Policy P.P29:	Oppose	Considers the proposed winter shutdown for earthworks will have significant economic burdens	Delete this policy

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	Winter shut down of earthworks.		for construction projects. Seeks for an economic impact assessment to be undertaken. Seeks for alternative mitigation measures to be implemented for essential earthworks, rather than a blanket prohibition.	
S18.058	9 Te Awarua-o-Porirua Whaitua	Rule P.R16: Vegetation clearance on highest erosion risk land-permitted activity.	Amend	Considers existing vegetation clearance rules under the NES-CF are sufficient. Seeks greater alignment with the NES-CF and a more scientific approach. Seeks for the consideration of positive effects of well-managed forests on water quality and biodiversity.	Amend this rule to default to the NES-CF standards for vegetation clearance.
S18.059	9 Te Awarua-o-Porirua Whaitua	Rule P.R17: Vegetation clearance on highest erosion risk land - controlled activity.	Amend	Considers existing vegetation clearance rules under the NES-CF are sufficient. Seeks greater alignment with the NES-CF and a more scientific approach. Seeks for the consideration of positive effects of well-managed forests on water quality and biodiversity.	Amend this rule to default to the NES-CF standards for vegetation clearance.
S18.060	9 Te Awarua-o-Porirua Whaitua	Rule P.R18: Vegetation clearance - discretionary activity.	Amend	Considers existing vegetation clearance rules under the NES-CF are sufficient. Seeks greater alignment with the NES-CF and a more scientific approach. Seeks for the consideration of positive effects of well-managed forests on water quality and biodiversity.	Amend this rule to default to the NES-CF for vegetation clearance rules.
S18.061	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry - controlled activity.	Amend	Concerned the activity status for forestry activities for Whaitua Te Whanganui-a-Tara bypasses the NES-CF. Concerned that PC1 rules do not align with the recommendations of the Te Awarua-o-Porirua Whaitua Implementation Programme. Considers that the assessment methodology undertaken for the s32 report (Greer, 2023a and 2023b) is insufficient to demonstrate the	Amend to recognise permitted activity status from the NES-CF.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				effectiveness of the proposed forestry rules, due to the lack of a peer-review, and flawed evaluation of retirement, space planting, and riparian management rules based on farming activities. Concerned that there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not. Considers that pastoral systems are treated preferentially to forestry and questions the scientific basis of the proposed regulations. Cites a study which highlights the positive impact of trees on water quality, and suggests that forests provide water storage during winter and release rainfall gradually, which mitigates downstream flooding. Seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-managed forests.	
S18.062	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry - discretionary activity.	Amend	Concerned the activity status for forestry activities for Whaitua Te Whanganui-a-Tara bypasses the NES-CF. Concerned that PC1 rules do not align with the recommendations of the Te Awarua-o-Porirua Whaitua Implementation Programme. Considers that the assessment methodology undertaken for the s32 report (Greer, 2023a and 2023b) is insufficient to demonstrate the effectiveness of the proposed forestry rules, due to the lack of a peer-review, and flawed evaluation of retirement, space planting, and riparian management rules based on farming activities. Concerned that there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not. Considers that pastoral systems are treated preferentially to forestry and questions the scientific basis of the proposed regulations. Cites a study which highlights the positive impact of trees on water quality, and suggests that forests provide	Amend activity status to restricted discretionary, with criteria that can be met by landowners.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				water storage during winter and release rainfall gradually, which mitigates downstream flooding. Seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-managed forests.	
S18.063	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity.	Oppose	Concerned PC1 rules do not align with the recommendations of the Te Awarua-o-Porirua Whaitua Implementation Programme. Considers that the assessment methodology undertaken for the s32 report (Greer, 2023a and 2023b) is insufficient to demonstrate the effectiveness of the proposed forestry rules, due to the lack of a peer-review, and flawed evaluation of retirement, space planting, and riparian management rules based on farming activities. Concerned that there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not. Considers that pastoral systems are treated preferentially to forestry and questions the scientific basis of the proposed regulations. Cites a study which highlights the positive impact of trees on water quality, and suggests that forests provide water storage during winter and release rainfall gradually, which mitigates downstream flooding. Seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-managed forests.	Delete the provision
S18.064	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Amend	Seeks clarification on if the rule applies to forestry earthworks.	Amend to clarify if the permitted activity requirement applies to forestry earthworks.
S18.065	9 Te Awarua-	Rule P.R23: Earthwork	Amend	Seeks clarification on if the rule applies to forestry earthworks.	Amend to clarify if restricted discretionary activity will apply to forestry earthworks.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	s - restricted discretionary activity.			
S18.066	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks - non-complying activity.	Amend	Seeks clarification on if the rule applies to forestry earthworks.	Amend to clarify if restricted discretionary activity will apply to forestry earthworks.
S18.067	9 Te Awarua-o-Porirua Whaitua	Rule P.R25: Farming activities on properties of between 4 hectares and 20 hectares - permitted activity.	Amend	Considers there is preferential leniency towards farming practices over forestry activities which disadvantages the forestry sector. Considers the approach obstructs the growth of both sectors and presents challenges for water quality. Considers the approach contradicts scientific evidence, leading to adverse social and economic consequences. Considers that farming activities should be subject to similar retirement rules as forestry activities.	Amend to include the retirement of farming activity in high-risk erosion land (pasture) and highest erosion-risk land (pasture).
S18.068	9 Te Awarua-o-Porirua Whaitua	Rule P.R26: Farming activities on 20 hectares or more of land - permitted activity.	Amend	Considers that there is preferential leniency towards farming practices over forestry activities which disadvantages the forestry sector. Considers the approach obstructs the growth of both sectors and presents challenges for water quality. Considers the approach contradicts scientific evidence, leading to adverse social and economic consequences. Considers that farming activities should be subject to similar retirement rules as forestry activities.	Amend to include the retirement of pastoral land use in high-risk erosion land (pasture) and highest erosion-risk land (pasture).
S18.069	9 Te Awarua-o-Porirua Whaitua	Table 9.5: Phase in of farm environment plans	Oppose	Considers there is preferential leniency towards farming practices over forestry activities which disadvantages the forestry sector. Considers the approach obstructs the growth of both sectors and presents challenges for water quality. Considers the	Delete Table 9.5

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		for Part Freshwater Management Units.		approach contradicts scientific evidence, leading to adverse social and economic consequences. Considers that farming activities should be subject to similar retirement rules as forestry activities.	
S18.070	12 Schedules	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Oppose	Considers an erosion and sediment management plan is redundant for forestry activities, as these are already managed under the NES-CF.	Delete this provision and default to the NES-CF
S18.071	12 Schedules	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	Oppose	Considers an erosion and sediment management plan is redundant for forestry activities, as these are already managed under the NES-CF.	Delete this schedule. Refer to NES-CF management plans.
S18.072	12 Schedules	Schedule 35: Small farm registration.	Amend	Seeks equal treatment for rural production, where there is high risk of erosion of land.	Amend to include the same option for small forests
S18.073	13 Maps	Map 90: Highest and high erosion risk land (Pasture) - Te Awarua-o-Porirua.	Oppose	Considers there is more research available to determine landslide by susceptibility, citing recent New Zealand research.	Delete the mapping layer or have it peer reviewed to establish its scientific validity.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S18.074	13 Maps	Map 91: Highest erosion risk land (Woody vegetation) - Te Awarua-o-Porirua.	Oppose	Considers there is more research available to determine landslide by susceptibility, citing recent New Zealand research.	Delete the mapping layer or have it peer reviewed to establish its scientific validity.
S18.075	13 Maps	Map 93: Highest and high erosion risk land (Pasture) - Te Whanganui-a-Tara.	Oppose	Considers that there is more research available to determine landslide by susceptibility, citing recent New Zealand research.	Delete the mapping layer or have it peer reviewed to establish its scientific validity.
S18.076	13 Maps	Map 94: Highest erosion risk land (Woody vegetation clearance) - Te Whanganui-a-Tara.	Oppose	Considers there is more research available to determine landslide by susceptibility, citing recent New Zealand research.	Delete the mapping layer or have it peer reviewed to establish its scientific validity.
S18.077	13 Maps	Map 95: Highest erosion risk land (Plantation forestry) - Te Whanganui-a-Tara.	Oppose	Considers there is more research available to determine landslide by susceptibility, citing recent New Zealand research.	Delete the mapping layer or have it peer reviewed to establish its scientific validity.

S199 Pikarere Farm Limited

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S199.001	General comments	General comments - overall	Not Stated	Considers the Plan is complicated and difficult to follow and the time to get to grips with it has been limited. Questions if the approach of PC1 is right, and notes that properties can vary greatly with steeper hill areas no more prone to erosion or run-off than valley floors. Is a party to the Ohariu/Makara Farmers' Submission and supports fresh, clean water and soil preservation.	Not stated
S199.002	12 Schedules	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Not Stated	Considers Farm Environment Plans should be specific to the property and practical and simple to prepare, and practical to implement, including in relation to costs. Considers nitrogen loss assessment and assessment tool should be practical and easy to work. Assessment of risks relating to farming activities and stream bank erosion calculations, assessment of slips and hill slope run-off should also be practical. Erosion risk treatment plans should be practical and take account of normal and proper farming operations.	Not stated
S199.003	General comments	General comments - economic cost/impact	Not Stated	Considers cost is an important factor and should be given proper consideration.	Not stated
S199.004	13 Maps	Map 91: Highest	Amend	Considers submitters farm, although identified on the "Highest Erosion Risk Land" shown on Maps 91	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		erosion risk land (Woody vegetation) - Te Awarua-o-Porirua.		and 94, does not include any significant erosion risk.	
S199.005	13 Maps	Map 94: Highest erosion risk land (Woody vegetation clearance) - Te Whanganui-a-Tara.	Amend	Considers submitters farm, although identified on the "Highest Erosion Risk Land" shown on Maps 91 and 94, does not include any significant erosion risk.	Not stated

S240 Porirua City Council

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S240.001	General comments	General comments - definitions	Not Stated	Considers a definition of 'urban environment' is required in place of 'urbanised area' in various proposed provisions to provide greater regulatory certainty.	Insert definition for Urban Environment: **Has the same meaning as given in section 1.4 of the National Policy Statement for Urban Development 2020.**
S240.002	General comments	General comments - economic cost/impact	Not Stated	Concerns that with the financial levers and system available, Council cannot afford the improvements Plan Change 1 is seeking. Considers it is not viable to expect city ratepayers alone to cover the magnitude of cost identified in the three waters reform programme and that the approach taken in Plan Change 1 is ignorant of the national issue that councils cannot afford to maintain and upgrade wastewater networks under the current funding model available to them. Notes it comes down to the degree to which	Regional Council work closely with territorial authorities on the challenge of funding maintenance and funding of wastewater networks.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				outcomes can be achieved, the length of time and who pays.	
S240.003	General comments	General comments - target attribute states	Oppose	Opposes the 2040 E.coli target of PC1 and concerned this will affect the consenting of stormwater and wastewater discharge consents. Considers that some catchments will require a 90% reduction which is impossible in the short timeframe. Concerned the rates increase of 12-14% per year for network upgrades to meet the 2040 target, on top of BAU rates, is not tenable. Considers that whilst the 2060 target of 6-7% is more achievable provided other funding avenues are explored, including growth charging and debt funding. Also notes significant central government funding will be required. Considers the numbers do not take into account debt affordability and availability with Local Government Funding Agency Covenants.	Not stated
S240.004	General comments	General comments - overall	Oppose	Considers the use of the prohibited activity rule is a blunt instrument and careful consideration should be given to its use, particularly when considering the tensions that exist between national policy statements for freshwater and urban development (noting that the NPS-UD requires consideration be given to out of sequence urban development). Considers there is insufficient evidence to support the approach taken, especially considering the prohibited activity status approach. Considers the definition and associated provisions may result in unintended consequences with no consenting pathway to consider a proposal located in these areas that may have positive outcomes, including positive outcomes for freshwater.	Not stated
S240.005	General comments	General comments - maps	Not Stated	Considers unplanned greenfield maps are inconsistent with Panel decisions on the Porirua Intensification Planning Instrument. Seeks that if the maps are retained for unplanned greenfield development, Greater Wellington officers engage with Council's planning officers to ensure maps	Greater Wellington officers engage with Council's planning officers to ensure maps accurately reflect the Hearing Panel's decisions. Otherwise, a policy pathway is provided for the final Future Urban Zoning in Porirua PDP to be subject to Policy P14 and associated rules and methods, rather than Policy P15.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				accurately reflect the Hearing Panel's decisions. Otherwise, a policy pathway needs to be provided for the final Future Urban Zoning in Porirua PDP to be subject to Policy P14 and associated rules and methods, rather than Policy P15.	
S240.006	General comments	General comments - urban development	Not Stated	Supports in principle Greater Wellington regulating Water Sensitive Urban Design (WSUD) and other stormwater controls to improve freshwater outcomes. Considers the provisions are light on detail on how WSUD will be implemented. It is unclear what specifications will apply to WSUD , how development will be monitored where no resource consent is required, and how these assets will be maintained and by who. Questions if there will be an MOU or transfer of functions for territorial authorities to play a role. Considers for WSUD to really deliver, a coordinated regional implementation programme is needed.	Not stated
S240.007	General comments	General comments - stormwater management	Not Stated	Unclear how the new plans and strategies which are required relate to each other, and how they relate to existing programmes such as Council's strategies and Wellington Water's current programme to develop stormwater management strategies.	Not stated
S240.008	General comments	General comments - overall	Not Stated	Considers the PDF format of PC1 and the NRP, with no hyperlinked definitions and with A4 maps in appendices, is out of step with current technology and best practice where plans are presented in digital formats. Considers converting PC1 and the NRP to an eplan format will improve regulatory compliance and reduce costs through time savings for plan users.	Request that Greater Wellington convert both the PC1 and the NRP to an eplan format as soon as practicable to enable plan users to efficiently find information
S240.009	2 Interpretation	Earthworks	Amend	Support use of National Planning Standards definition, and limiting application to new provisions to avoid unintended consequences with operative provisions.	Amend definition as follows: For Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua only:

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				Seeks that Rule P.R22 is amended to include exclusions for activities like road maintenance. Notes the reference to the National Policy Statement needs to be updated.	The alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, and disturbance of land for the installation of fence posts. Except that, for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20, 'earthworks' has the same meaning as given in section 3 of the ~~Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.~~**Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2023**
S240.010	2 Interpretation	Hydrological control	Amend	Considers the definition does not assist in the implementation of associated rules as it does not outline examples of what these controls actually are. Notes the definition of 'stormwater treatment system' has some examples on what types of systems are included along with specifications in Schedule 28.	Amend definition to provide clarity to plan users.
S240.011	2 Interpretation	Impervious surfaces	Amend	Notes there is no rule requiring rainwater reuse in PC1 or the NRP. Supports 'roof areas with rainwater collection' being excluded, as this is regulated through the Three Waters Chapter of the Proposed Porirua District Plan subject to Wellington Water specifications that provide for some limited reuse for gardening but do not require tanks to be plumbed back into the house. Concerns that this is a significant cost that not been assessed in the s32 Evaluation.	Amend definition as follows: Surfaces that prevent or significantly impede the infiltration of stormwater into soil or the ground, includes: -roofs -paved areas (including sealed/compacted metal) such as roads, driveways, parking areas, sidewalks/foot paths or patios, and excludes: -grassed areas, gardens and other vegetated areas -porous or permeable paving -slatted decks which allow water to drain through to a permeable surface -porous or permeable paving and living roofs -roof areas with rainwater collection ~~and reuse~~ ~~-any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)~~

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S240.012	2 Interpretation	Limit	Amend	Referring to the source document of the definition would be more consistent with other definitions below e.g. 'Nationally threatened freshwater species'.	Amend definition as follows: **Has the same meaning as given in section 1.4 of the National Policy Statement for Freshwater Management 2020:** **A limit on resource use or a take limit.**
S240.013	2 Interpretation	Redevelopment	Amend	Considers the definition does not work in the context of the associated rules. Notes that Policy WH.P2 seeks to "encourage" redevelopment, but associated provisions do not permit the associated increases in impervious surfaces that are included in this definition which would be expected with the use of this term in a policy. Notes that WH.R4 refers to "redevelopment of existing impervious surfaces" which is unnecessary as the definition of redevelopment is inclusive of impervious surfaces. Concerned the definition would capture small-scale redevelopment such as rooms being added on to existing homes. Considers these should be exempted as the Proposed Porirua District Plan would address these additional surfaces. In addition 'urban environment' is a term defined in the NPS-UD, and it would provide greater certainty than 'urbanised property'.	Amend the definition as follows: For the purpose of assessment of a proposal involving the redevelopment of an existing ~~urbanised~~ property **in an urban environment** (~~i.e~~ **including** brownfield development **and** upgrades to existing roads ~~etc.~~) in relation to stormwater effects. ~~this includes the replacement, reconstruction or addition (new) of impervious surfaces.~~ Excludes: -minor maintenance or repairs to roads, carparking areas, driveways and paving -installation, maintenance or repair of underground infrastructure or network utilities requiring trenching and resurfacing -activities that only involve the re-roofing of existing buildings**-extensions to existing buildings**
S240.014	2 Interpretation	Unplanned greenfield development	Amend	Concerned the definition and associated provisions may result in unintended consequences with no consenting pathway to consider a proposal located in these areas that may have positive outcomes, including for freshwater. Notes this is covered in more detail in relation to Policy P.P2 in the submission. Considers Map 86 will not align with the decisions version of the Proposed Porirua District Plan (covered in more detail in relation to Map 86). Considers rezoning development areas requires the application of a range of zones, including from rural to open space zones for future reserves, therefore the following is not always accurate: '(from	Amend definition as follows: Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 which also require an underlying zone change ~~(from rural/nonurban/ open space to urban)~~ though a District Plan change to enable the development.~~Note: Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023.~~

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				rural/nonurban/ open space to urban)', nor is the note.	
S240.015	2 Interpretation	Wastewater network catchment or sub-catchment	Amend	Unclear if definition is intended to capture the wastewater network that exists on private land, including sewer laterals (assumes not)	Amend definition as follows: The wastewater pipes, pumpstations, storage tanks, manholes and associated devices located upstream of or prior to a wastewater treatment plant **in public ownership.** A wastewater network catchment may be split into a number of sub-catchments.
S240.016	6 Other methods	Method M36: Freshwater Action Plan programme.	Amend	Supports action plans to achieve objectives and considers action plans should be developed in partnership with territorial authorities rather than being informed by them. Working in partnership would reflect the long-term partnership approach taken under the Harbour Strategy and Action Plan between councils and Ngāti Toa. Considers the s32 evaluation of Council feedback on this point at pre-notification consultation has not addressed this concern and does not make sense, as Method M36 seeks to direct a partnership with mana whenua (submitter references paragraph 51 of Part A of the s32 report). Considers Council is a key stakeholder as a regulator, land owner and asset owner and an action plan developed in partnership with Council is more likely to be successful.	Amend the method so that territorial authorities are partners to development and delivery of action plans: Method M36: Freshwater Action Plan programme Wellington Regional Council will implement a programme to prepare, deliver, monitor and review Freshwater Action Plans for all part Freshwater Management Units identified in Schedule 27. Freshwater Action Plans will be: (a) developed in partnership with mana whenua **and territorial authorities,** and be informed by engagement with catchment communities, ~~territorial authorities~~ and stakeholders, and (b) prepared and published for all Freshwater Management Units and/or part Freshwater Management Units in the Wellington region by December 2026, and (c) prepared for all attributes identified in Schedule 27 A2. Freshwater Action Plans may also be prepared for, or incorporate, actions for any other relevant target attribute state or environmental outcome identified in partnership with mana whenua or with the community. Wellington Regional Council, in partnership with mana whenua **and territorial authorities,** and informed by engagement with catchment communities, ~~territorial authorities~~ and stakeholders, may make changes or additions to any Freshwater Action Plan, at any time, for the purpose of achieving the target attribute states and/or environmental outcomes set in this Plan.

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S240.017	6 Other methods	Method M38: Freshwater Action Plan for the Rangituhi catchment.	Amend	Supports action plans to achieve objectives and considers action plans should be developed in partnership with territorial authorities rather than being informed by them. Working in partnership would reflect the long-term partnership approach taken under the Harbour Strategy and Action Plan between councils and Ngāti Toa. Considers Council is a key stakeholder as a regulator, land owner and asset owner and an action plan developed in partnership with Council is more likely to be successful. Notes that Method M38(c) can only occur in partnership with Council as the owner of the piped public stormwater network.	Amend so that territorial authorities are partners to development and delivery of action plans: Method M38: Freshwater Action Plan for the Rangituhi catchment Wellington Regional Council will, in partnership with Ngāti Toa Rangatira **and Porirua City Council,** prepare a Freshwater Action Plan for the Rangituhi catchment to contribute to achieving the target attribute states identified in Objectives P.O3 Table 9.1 and P.O6 Table 9.2 and relevant environmental outcomes identified in Objective P.O3 and P.O6, and including the huanga of mahinga kai and Māori customary use as identified by Ngāti Toa Rangatira. In accordance with Schedule 27, the Rangituhi Freshwater Action Plan will identify, in detail, the actions, including actions to support effective regulation, to achieve the target attribute states and environmental outcomes in Objectives P.O3 and P.O6. The Rangituhi Freshwater Action Plan will include: (a) prioritising improvements to hotspot areas of elevated metal concentrations within the harbour, and (b) implementing a targeted pollution prevention programme, and (c) identifying areas of piped stream in the lower reaches of the Rangituhi catchment that could be daylighted.
S240.018	6 Other methods	Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara	Support	Supports the development of a Freshwater Action Plan for the nationally threatened freshwater species	Retain as notified

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		and Te Awarua-o-Porirua Whaitua.			
S240.019	6 Other methods	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Support	Supports identification and remediation of barriers to fish passage.	Retain as notified
S240.020	6 Other methods	Method M41: Identifying and responding to degradation in freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Support	Supports monitoring and addressing causes of any degradation of freshwater bodies.	Retain as notified

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S240.021	6 Other methods	Method M43: Supporting the health of urban waterbodies.	Amend	Supports in principle but considers method lacks detail in terms of timing and methodology. Notes that 'deemed to comply' solutions should sit within provisions relating to hydrological controls as outlined in the submission.	Amend method to include timeframes and methodology for all actions.
S240.022	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Amend	Supports in principle but considers method lacks detail in terms of timing and methodology.	Amend method to include timeframes and methodology for all actions.
S240.023	6 Other methods	Method M45: Funding of wastewater and stormwater network upgrades	Amend	Supports in principle but considers method lacks detail in terms of timing and methodology. Questions the achievability of other regulatory provisions if additional sources of funding cannot be accessed.	Amend method to include timeframes and methodology, and/or amend regulatory policies that are reliant on additional funding for wastewater and stormwater networks to be achievable with existing funding sources.
S240.024	9 Te Awarua-o-Porirua Whaitua	Objective P.O1: The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine	Amend	Supports 100 year vision towards full restoration of Te Awarua-o-Porirua waterways. Considers it unclear if the text from "Note In the wai ora state..." forms part of the objective or it is some form of explanatory/advisory note. If it does form part of the objective, seeks the deletion of the word "note". Considers it is not possible for waters to be in a natural state without the full restoration of the catchment to a pre-human state which is not the intention of this Plan Change, suggest that a qualifier is needed that waters are restored where possible.	Amend objective as follows: Objective P.O1 The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100. ~~Note~~ In the wai ora state: • Te Awarua-o-Porirua is a taonga of Ngāti Toa Rangatira and must be respected by others • Mauri is restored, and waters **restored to** ~~are in~~ a natural state **where possible** • Ecological health is excellent in freshwater and coastal water environments • Rivers flow naturally, with ripples and the river beds are stony

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		area is progressively improved and is wai ora by 2100.			• Mahinga kai, taonga, mahinga ika and kaimoana species are healthy, abundant, diverse, present across all stages of life, sizeable, and able to be culturally harvested by mana whenua • Mahinga kai, taonga, mahinga ika and kai moana species are safe to harvest and eat or use, including for mana whenua to exercise manaakitanga • Mana whenua and communities are able to undertake a full range of activities • Mana whenua are able to undertake cultural activities and practices
S240.025	9 Te Awarua-o-Porirua Whaitua	Objective P.O2: Te Awarua-o-Porirua's groundwater, rivers, lakes and natural wetlands, and their margins are on a trajectory of measurable improvement towards wai ora.	Amend	Support in principle setting a trajectory of measurable improvement towards restoration of Te Awarua-o-Porirua's waterways. Notes that P.O2 does not link to a table of target attribute states and it is not clear what locations and what specific state is required to meet these. WH.O8 for example sets out specific E.coli states for primary contact sites, but it is unclear what E.coli states need to be achieved to meet primary contact outcomes WH.O2 (f) and (g) in areas outside these specific sites. Notes there are significant challenges in costs to upgrade the wastewater network to achieve this objective in terms of a reduction in E.coli by 2040 to achieve Criteria P.O2 (f) and (g).	Amend objective to link to specify target attribute states and locations for outcomes being sought, and amend the objective as follows: Objective P.O2 Te Awarua-o-Porirua's groundwater, rivers, lakes and natural wetlands, and their margins are on a trajectory of measurable improvement towards wai ora, such that by 2040: (a) water quality, habitats, water quantity and ecological processes are at a level where the state of aquatic life is meaningfully improved, and (b) erosion processes, including bank stability, are improved to significantly reduce the sedimentation rate in the harbour to a more natural level, and (c) the extent and condition of indigenous riparian vegetation is increased and improved, and (d) the diversity, abundance and condition of mahinga kai are increased so that mana whenua are able to harvest healthy mahinga kai for their people, and (e) huanga of mahinga kai and Māori customary use for locations identified in Schedule B (Ngā Taonga Nui a Kiwa) are maintained or improved, and**by 2060:** (f) mana whenua are able to safely connect with freshwater and are able to practice their customary and cultural practices, including mahinga kai gathering, and (g) mana whenua and communities can safely connect with

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					waterbodies and enjoy a wider range of activities, including swimming, paddling and food gathering, and (...)
S240.026	9 Te Awarua-o-Porirua Whaitua	Objective P.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Pāuatahanui Inlet, Onepoto Arm and the open coastal areas of Te Awarua-o-Porirua is maintained or improved to achieve the coastal water objectives set out in Table 9.1.	Amend	Support in principle setting a trajectory of measurable improvement towards restoration of Te Awarua-o-Porirua's coastal water quality. Notes there are significant challenges in costs to upgrade the wastewater network to achieve this objective in terms of a reduction in E.coli by 2040 to achieve Criteria P.O3 (g) and (h).	Amend objective as follows: Objective P.O3 The health and wellbeing of coastal water quality, ecosystems and habitats in Pāuatahanui Inlet, Onepoto Arm and the open coastal areas of Te Awarua-o- Porirua is maintained or improved to achieve the coastal water objectives set out in Table 9.1, and by 2040: (a) sediment and metal loads entering the harbour arm catchments either via freshwater bodies or directly are significantly reduced, and (b) high contaminant concentrations, including around discharge points, are reduced, and (c) the diversity, abundance and condition of mahinga kai has increased so that mana whenua access to healthy mahinga kai has increased, and (d) huanga of mahinga kai and Māori customary use for locations identified in Schedule B (Ngā Taonga Nui a Kiwa) are maintained or improved, and (e) the extent and condition of estuarine seagrass, saltmarsh and brackish water submerged macrophytes are increased and improved to support abundant and diverse biota, and (f) coastal areas support healthy functioning ecosystems, and their water conditions and habitats support the presence, abundance, survival, and recovery of taonga species and At-risk and Threatened species, and**by 2060:** (g) mana whenua are able to safely connect with and access the coastal marine area and practice their customary and cultural tikanga, and (h) mana whenua and communities can safely connect with the coastal marine area and enjoy a wider range of activities, including food gathering, swimming and paddling.
S240.027	9 Te Awarua-	Table 9.1: Coastal	Amend	Concerned about the 12-14% increased cost per year to ratepayers to meet the 2040 E.coli limit (as stated in the s32 report) on top of BAU rates	Amend the timeframe for target states for E.coli and enterococci coastal water objectives to 2060.

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	o-Porirua Whaitua	water objectives.		increases of between 10-30% and the affordability of this for ratepayers. Considers the 2060 target of 6-7% is more achievable provided other funding avenues are explored, including growth charging and debt funding. Notes significant central government funding will also be required. Considers the numbers do not take into account debt affordability and availability with Local Government Funding Agency Covenants. Considers that repairing the public network would only reduce a proportion of the contaminant load and there are known issues with private laterals that make up half the network by length and a significant portion of untreated discharges to land and water. Notes costs that would fall on landowners to upgrade pipes within the private network are not figured into the s32 Evaluation, and these investments would be substantial to meet the 2040 target. Considers laterals on private property are the responsibility of the landowner, and they must bear the costs to fix them when faulty rather than the ratepayer. Concerned about the practical administrative issues of Council undertaking the work, or funding it upfront with cost recovery. Considers costs to address these issues could be between $10,000 to $20,000 per property or more with Wellington Water's high level indicative estimates between $250 - 350 million. Considers the impact of the above funding requirements on housing and business development capacity is not sufficiently explored in the s32 Evaluation.	
S240.028	9 Te Awarua-o-Porirua Whaitua	Objective P.O4: The extent, condition, and	Support	Supports in principle.	Retain as notified.

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		connectivity of habitats of nationally threatened freshwater species are increased, and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status.			
S240.029	9 Te Awarua-o-Porirua Whaitua	Objective P.O5: Groundwater flows and levels, and water quality, are maintained.	Support	Supports in principle.	Retain as notified.
S240.030	9 Te Awarua-o-Porirua Whaitua	Objective P.O6: Water quality,	Support	Supports in principle.	Retain as notified.

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		habitats, water quantity and ecological processes of rivers are maintained or improved.			
S240.031	9 Te Awarua-o-Porirua Whaitua	Table 9.2: Target attribute states for rivers.	Amend	Concerned about the 12-14% increased cost per year to ratepayers to meet the 2040 E.coli limit (as stated in the s32 report) on top of BAU rates increases of between 10-30% and the affordability of this for ratepayers. Considers the 2060 target of 6-7% is more achievable provided other funding avenues are explored, including growth charging and debt funding. Notes significant central government funding will also be required. Considers the numbers do not take into account debt affordability and availability with Local Government Funding Agency Covenants. Considers that repairing the public network would only reduce a proportion of the contaminant load and there are known issues with private laterals that make up half the network by length and a significant portion of untreated discharges to land and water. Notes costs that would fall on landowners to upgrade pipes within the private network are not figured into the s32 Evaluation, and these investments would be substantial to meet the 2040 target. Considers laterals on private property are the responsibility of the landowner, and they must bear the costs to fix them when faulty rather than the ratepayer. Concerned about the practical administrative issues of Council undertaking the	Amend the timeframe for target states for e.coli and enterococci coastal water objectives to 2060.

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				work, or funding it upfront with cost recovery. Considers costs to address these issues could be between $10,000 to $20,000 per property or more with Wellington Water's high level indicative estimates between $250 - 350 million. Considers the impact of the above funding requirements on housing and business development capacity is not sufficiently explored in the s32 Evaluation.	
S240.032	9 Te Awarua-o-Porirua Whaitua	Policy P.P1: Improvement of aquatic ecosystem health.	Support	Supports the progressive reduction of contaminants and restoration of habitats.	Retain as notified.
S240.033	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	Considers prohibition of unplanned greenfield development may result in unintended consequences with no consenting pathway to consider a proposal located in these areas that may have positive outcomes, including positive outcomes for freshwater. Considers the activity status is a blunt instrument that would also make an incursion into these areas prohibited no matter how small. For example a new road connecting urban areas (or urban to rural areas) would be prohibited if it needed to "clip" an area mapped as unplanned. Considers policy direction should be amended to "avoid" with a non-complying activity status. Notes the application of a prohibited activity status requires a high level of evaluation to justify its use and considers that the s32 Evaluation is insufficient. Considers the s32 Evaluation contains contradictory statements with regard to the ability of PC1 to mitigate contaminants from urban developments. Questions how a prohibited activity status could be justified on an effects management basis if PC1	Amend the policy as follows: Policy P.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (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~~(b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and~~ (c) imposing hydrological controls on urban development and stormwater discharges to rivers, and (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous

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				manages all water quality effects, including residual effects as stated in the s32. Considers the prohibition on greenfield development is inconsistent with the NPS-UD. Considers Map 86 is inconsistent with the decisions on the Proposed Porirua District Plan. In some instances the unplanned area includes areas confirmed as Future Urban Zone including in Waitangirua, Pukerua Bay and Judgeford. There are also parts of Judgeford that were not rezoned as Future Urban Zone due to natural hazard risk. Considers the avoid/prohibited approach may directly conflict with Council's ability to give effect to the NPS-UD. Concerned Hongoeka has been identified as an area of unplanned urban development, meaning any greenfield development in this area is prohibited. This will likely be of concern to Hongoeka Whanau. Hongoeka is partly urban in nature in terms of lots sizes, and has reticulated sewerage and drinking water supply. Council worked in partnership with Te Rūnanga and with the Hongoeka Marae Committee on creating an enabling zoning for this area in the PDP. Considers a prohibited activity status makes it difficult for territorial authorities to consider a plan change in an unplanned greenfield area as per Policy 8 of the NPS-UD. Concerned about having to undertake two plan changes (both a district and regional plan change) would be an administrative and financial impediment to urban development and the economic impact of having to undertake two parallel plan changes has not been fully assed in the s32 with regard to the NPS-UD, or in terms of the impact on housing and business capacity. States intent of P.P2(b) is unclear and is	vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.

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				inconsistent with and duplicates (c) and (d). Supports the regulation of contaminant discharges from redevelopment activities, and considers that the "encouraging" policy direction is inconsistent with the "imposing" and "requiring" policy direction in (c) and (d).	
S240.034	9 Te Awarua-o-Porirua Whaitua	Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Amend	Supports action plans to achieve objectives and considers action plans should be developed in partnership with territorial authorities rather than being informed by them. Considers Council is a key stakeholder as a regulator, land owner and asset owner and an action plan developed in partnership with Council is more likely to be successful.	Amend the policy as follows: Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways Wellington Regional Council shall, in partnership with mana whenua **and territorial authorities,** prepare and deliver Freshwater Action Plans in accordance with Schedule 27 (Freshwater Action Plan). The first iteration of Freshwater Action Plans, to cover all rivers and lakes in Te Awarua-o-Porirua Whaitua, shall be completed by December 2026. Freshwater Action Plans shall identify, in detail, the actions, including to support effective regulation, to achieve the target attribute states, and support relevant environmental outcomes, set in this Plan.
S240.035	9 Te Awarua-o-Porirua Whaitua	Policy P.P4: Contaminant load reductions.	Support	Supports in principle the reduction in annual sediment load.	Retain as notified.
S240.036	9 Te Awarua-o-Porirua Whaitua	Policy P.P5: Localised adverse effects of point source discharges.	Support	Supports in principle the reduction in point source discharges.	Retain as notified.
S240.037	9 Te Awarua-	Policy P.P6: Point	Support	Supports in principle the reduction in point source discharges.	Retain as notified.

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	o-Porirua Whaitua	source discharges .			
S240.038	9 Te Awarua-o-Porirua Whaitua	Policy P.P7 Discharges to groundwater.	Amend	Supports in principle the reduction in point source discharges to ground water. Considers the policy is unclear, for example, it is not clear how will these discharges be managed or how the quality of groundwater will be measured in terms of water quality attributes.	Review wording of policy to clarify intent.
S240.039	9 Te Awarua-o-Porirua Whaitua	Policy P.P8 Avoiding discharges of specific products and waste.	Amend	Supports in principle avoiding discharges of these contaminants but notes it is near impossible to regulate individual landowners from discharging cleaning products and paints. Considers non-regulatory methods need to be used to educate people. Notes clause (b) would capture any animals that are confined, including sheep in a paddock at a low density. If the intent of to capture intensive indoor farming this should be clarified.	Amend policy as follows: Policy P.P8 Avoiding discharges of specific products and waste Avoid discharges to freshwater and coastal water, including where this is via the stormwater network, of: (a) chemical cleaning products, paint, solvents, fuels and coolant, oil, wet cement products and drill cooling water, or (b) animal effluent from an animal effluent storage facility or from an area where animals are confined **indoors,** or (c) untreated industrial or trade waste, or (d) untreated organic waste or leachate from storage of organic material.
S240.040	9 Te Awarua-o-Porirua Whaitua	Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Support	Supports the policy in principle.	Retain as notified.
S240.041	9 Te Awarua-o-Porirua Whaitua	Policy P.P10: Managing adverse	Amend	Supports in principle regulating stormwater contaminants through hydrological control and water sensitive urban design measures (WSUD) to improve freshwater outcomes.	Develop a more comprehensive policy and implementation framework with regard to hydrological control and water sensitive urban design measures, including acceptable solutions and amend policy accordingly.

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		effects of stormwater discharges.		Considers there is a degree of overlap with district plan rules which also manage hydrology of stormwater from urban development and the s32 Evaluation has not addressed this overlap in functions. Considers for hydrological controls and WSUD to really deliver, a coordinated regional implementation programme is needed. Notes that the while the Three Waters chapter of the Proposed Porirua District Plan does not explicitly require water sensitive design, this is promoted through the requirements for hydraulic neutrality and compliance with the Wellington Water Regional Standard for Water Services May 2019. It also provides specifications for rules such as rainwater thanks which are required for new residential units. Considers the PC1 provisions are light on detail on how hydrological controls and WSUD will be implemented including what specifications will apply to WSUD and what would be considered an acceptable solution to comply with the provisions. Considers if the NRP included technical specifications, smaller developments could rely on these without having to develop a bespoke solution for their site and undertake expensive hydrological and/or engineering calculations to demonstrate compliance. Support recognition of catchment scale communal schemes which may be more appropriate from a maintenance perspective than lots of small systems.	
S240.042	9 Te Awarua-	Policy P.P11: Discharge	Support	Supports managing these discharges.	Retain as notified

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	o-Porirua Whaitua	s of a contaminant in stormwater from high risk industrial or trade premises.			
S240.043	9 Te Awarua-o-Porirua Whaitua	Policy P.P12: Managing stormwater network discharges through a Stormwater Management Strategy.	Amend	Supports the use of stormwater management strategies to achieve freshwater outcomes but considers clause (c) could be strengthened to be more active, as other contaminants are transported via the stormwater system that need to be reduced to achieve objectives and target attribute states including E.coli and sediment.	Amend policy as follows: Policy P.P12: Managing stormwater network discharges through a Stormwater Management Strategy Stormwater discharges from local authority and state highway networks shall be managed by: (a) reducing the copper and zinc loads in discharges to the coastal water management units of Onepoto Arm and Pāuatahanui Inlet in Map 82 and the harbour arm catchments in Map 84 by 15% for copper and 40% for zinc to contribute to meeting the target attribute states and coastal water objectives for copper and zinc in the Onepoto Arm and Pāuatahanui Inlet of Te Awarua-o-Porirua, and (b) reducing the copper and zinc loads in discharges to the Open Coast coastal water management units to contribute to meeting the coastal water objectives to maintain or improve, and (c) reducing the concentration and contaminant loads of copper and zinc from discharges to surface water bodies in order to maintain, and in degraded part Freshwater Management Units improve, the water quality state for dissolved copper and zinc to contribute to meeting the target attribute states in those part Freshwater Management Units, and (d) ~~supporting the achievement of any~~ **reducing the concentration of contaminant loads to achieve** other relevant target attribute states or coastal water objectives including for ecosystem health, nutrients, visual clarity and Escherichia coli or enterococci,

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					and (e) implementing a stormwater management strategy and stormwater management plans prepared in accordance with the information and requirements set out in Schedule 31 (stormwater strategy - whaitua), and (f) monitoring and modelling the stormwater network to identify catchments to be prioritised, the copper and zinc concentrations and loads in the discharge, and changes in discharge volume and quality over time following improvements in the network infrastructure, and (g) prioritising the reduction, removal, and/or treatment of stormwater discharges to Schedule A (outstanding water bodies) or Schedule C (mana whenua) sites, or mahinga kai.
S240.044	9 Te Awarua-o-Porirua Whaitua	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Considers 'minimised' means the same as 'reduced to the extent practicable'. Changes suggested so clause WH.P14(b) aligns with P.R6 and P.R7.	Amend the policy as follows: Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces The adverse effects of stormwater discharges from new greenfield development **and redevelopment of existing urban areas shall be minimised,** ~~and adverse effects of stormwater discharges from existing urban areas reduced to the extent practicable, upon redevelopment,~~ through implementing: (a) an on-site stormwater treatment system or an off-site communal stormwater treatment system that is designed to: (i) receive at least 85% of the mean annual runoff volume stormwater generated from new and redeveloped impervious surfaces of the property, and (ii) achieve copper and zinc load reductions factors equivalent to that of a raingarden/bioretention device, and (b) where stormwater discharges will enter a river **directly or indirectly (through an existing local authority stormwater network),** hydrological controls either on-site, or off-site via a communal stormwater treatment system.
S240.045	9 Te Awarua-	Policy P.P14: Stormwate	Support	Supports policy in principle as it provides a pathway for development while addressing residual adverse effects.	Retain as notified.

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	o-Porirua Whaitua	r contaminant offsetting for new greenfield development.			
S240.046	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Oppose	Considers there is an insufficient evidence base to support the approach being taken, especially considering that there is a prohibited activity status associated with new unplanned greenfield development. Considers that a consenting pathway is required through a non-complying activity status to avoid any unintended consequences that may result through taking a prohibited approach. Considers this policy directly duplicates P.P2(a) and is therefore unnecessary.	Delete Policy P.P15
S240.047	9 Te Awarua-o-Porirua Whaitua	Policy P.P16: General wastewater policy to achieve target attribute states and coastal water objectives.	Amend	Supports in principle the maintenance and improvement of wastewater discharges, subject to relief sought in regard to target attribute states for E.coli in Table 9.1 and 9.2.	Retain as notified provided target attribute states for E.coli amended to 2060 in Table 9.1 and 9.2.
S240.048	9 Te Awarua-o-Porirua Whaitua	Policy P.P17: Progressing works to meet Escherichia coli	Amend	Policy duplicates Local Government Act responsibilities as it directs operational asset management decision making rather than directing what matters will be considered in assessing resource consents for wastewater network catchment discharges	Delete policy, or reframe to direct decision making on wastewater network catchment discharges.

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		target attribute states.			
S240.049	9 Te Awarua-o-Porirua Whaitua	Policy P.P18: Managing wastewater network catchment discharges.	Amend	Supports in principle the maintenance and improvement of wastewater discharges, subject to relief sought in regard to target attribute states for E.coli in Tables 9.1 and 9.2. Considers it unclear under criterion (d) what constitutes an inflow and infiltration programme, and who this will be prepared by and when. Criterion (h) duplicates Local Government Act responsibilities, it appears to direct operational decision making and asset management planning rather than directing what matters will be considered in assessing resource consents for wastewater network catchment discharges. Various other changes are sought to the wording of the policy to reduce unnecessary repetition.	Amend policy as follows: Policy P.P18: Managing wastewater network catchment discharges All wastewater network catchment discharges, including those which discharge via a stormwater network, shall be managed by: (a) progressively reducing the frequency and/or volume of wet weather overflow events to meet or exceed ~~the containment standard of~~ no more than 2 per year through the implementation of the methodologies set out in a Wastewater Network Catchment Improvement Strategy prepared in accordance with Schedule 32 ~~(wastewater strategy),~~ and (b) prioritising the removal of wet weather overflows in wastewater network sub-catchments where wet weather overflows are discharging to Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule H (contact recreation and Māori customary use) sites and mahinga kai, and (c) progressively reducing the frequency and/or volume of dry weather discharges or the potential for these discharges through the implementation of a Wastewater Network Catchment Improvement Strategy prepared in accordance with Schedule 32 ~~(wastewater strategy)~~ to contribute to meeting the target attribute states for Escherichia coli in Table 9.2 and the coastal water objectives for enterococci in Table 9.1, and (d) ~~implementing an inflow and infiltration programme to~~ proactively upgrade the pipe network to progressively reduce stormwater and groundwater infiltration and inflow into the wastewater network catchment, and (e) engaging with mana whenua on their values and interests in relation to discharges and receiving waters, including adverse effects on Māori customary use and

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					mahinga kai, and (f) avoiding wastewater network catchment discharges entering private property or educational facilities, and (g) avoiding increasing the frequency and/or volume of wastewater network catchment discharges as a result of climate change, or ~~new~~ urban development ~~and intensification, and~~ ~~(h) monitoring and modelling the wastewater network catchment to identify catchments to be prioritised, the Escherichia coli or enterococci concentration in the discharge, and changes in discharge frequency, volume and quality over time following improvements in the network infrastructure.~~
S240.050	9 Te Awarua-o-Porirua Whaitua	Policy P.P19: Managing existing wastewater treatment plant discharges.	Amend	Clauses (d), (e) and (g) duplicate Local Government Act responsibilities including directing operational asset management decision making rather than directing the matters that will be considered in assessing resource consents for wastewater treatment plant discharges.	Amend policy as follows: Policy P.P19: Managing existing wastewater treatment plant discharges All existing wastewater discharges from a treatment plant shall be managed by: (a) maintaining or reducing the Escherichia coli or enterococci load in the discharge where the target attribute state for Escherichia coli in Table 9.2 or the coastal water objectives for enterococci as set out in Table 9.1 are met, and (b) monitoring the discharge to identify trends over time, the Escherichia coli or enterococci concentration and loads in the discharge, and changes to receiving water quality at the zone of reasonable mixing over time, and (c) engaging with mana whenua on their values and interests in relation to the discharge and receiving water, including adverse effects on Māori customary use and mahinga kai, and~~(d) assessing the adequacy of existing and planned capacity of wastewater treatment plant systems, and~~ ~~(e) maintaining and upgrading existing wastewater treatment plants to provide for population growth and climate change, and~~ (f) monitoring mahinga kai health within and at the outer extent of the zone of reasonable mixing, and~~(g) investigating~~

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					~~technological improvements and other methods to reduce or remove wastewater discharges to water.~~ Note Kaitiaki monitoring teams within the Whaitua must be engaged with and be provided the opportunity to undertake the kaitiaki monitoring.
S240.051	9 Te Awarua-o-Porirua Whaitua	Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Amend	Supports reducing diffuse discharges from farming activities, however consider this policy can be deleted as it unnecessarily cross references other policies.	Delete Policy P.P20
S240.052	9 Te Awarua-o-Porirua Whaitua	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Support	Supports reducing diffuse discharges from farming activities.	Retain as notified.
S240.053	9 Te Awarua-o-Porirua Whaitua	Policy P.P22: Achieving reductions in sediment discharges	Amend	Supports reducing hill country erosion to reduce sediment loads into waterways. Considers planting of native species should be encouraged where these can provide suitable stabilisation for erosion prone land, this would also assist improving biodiversity values within the catchment.	Amend policy as follows: Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion Reduce discharges of sediment from farming activities on high erosion risk land and highest erosion risk land by: (a) identifying highest erosion risk land (pasture) and high

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		from farming activities on land with high risk of erosion.			erosion risk land (pasture), and (b) requiring that farm environment plans prepared for farms with highest erosion risk land (pasture) and/or high erosion risk land (pasture) include an erosion risk treatment plan, and (c) ensuring erosion risk treatment plans: (i) deliver permanent woody vegetation cover on at least 50% of highest risk erosion land (pasture) that is in pasture on a farm within 10 years and appropriate erosion control treatment for the remaining highest risk erosion land (pasture) and high erosion risk land (pasture) that is in pasture on the farm, and (ii) identify and respond to risks of sediment loss on high erosion risk land (pasture) associated with grazing livestock, earthworks or vegetation clearance, by using effective erosion control treatment, and**(iii) encouraging planting of native species where these can provide suitable stabilisation for erosion prone land, and** (d) Wellington Regional Council providing support to landowners to implement erosion risk treatment plans.
S240.054	9 Te Awarua-o-Porirua Whaitua	Policy P.P23: Phasing of farm environment plans.	Support	Supports phased timetable for implementing farm plans.	Retain as notified.
S240.055	9 Te Awarua-o-Porirua Whaitua	Policy P.P24: Managing rural land use change.	Support	Supports restricting land use change to those that maintain or reduce diffuse discharges.	Retain as notified.
S240.056	9 Te Awarua-o-Porirua Whaitua	Policy P.P25: Promoting stream shading.	Support	Supports progressive shading of streams to improve habitats.	Retain as notified.

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S240.057	9 Te Awarua-o-Porirua Whaitua	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Support	Supports reduction of sediment discharges from forestry.	Retain as notified.
S240.058	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Support	Supports management of sediment discharges from earthworks.	Retain as notified.
S240.059	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Amend	Supports intent of policy, but considers it is written more like a rule or a standard	Reword as a policy, or relocate into rules section of Chapter.
S240.060	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose	Notes the s32 evaluation states there is higher risk for discharges of sediment from earthworks over the winter period. Considers large storm events cause larger pulses of sediment discharges and that large storm events are becoming more unpredictable and can occur anytime throughout the year. Notes a poor summer earthworks season due to adverse weather may result in significant lost time to safely undertake earthworks, and the winter period may be appropriate for projects to catch up on progress and stabilise the land. Considers the BAU approach for winter earthworks should be maintained, i.e. as a standard condition of consent as a discretionary activity as these	Amend policy as follows: ~~Policy P.P29: Winter shut down of earthworks~~ ~~Earthworks over 3,000m2 in area shall:~~ ~~(a) be shut down from 1st June to 30th September each year, and~~ ~~(b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).~~

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				conditions allow for GW to provide permits to undertake earthworks within this period as appropriate and subject to conditions.	
S240.061	9 Te Awarua-o-Porirua Whaitua	Rule P.R1: Point source discharges of specific contaminants - prohibited activity.	Support	Supports in principle the avoidance of these discharges, but notes reducing them will rely heavily on non-regulatory means including education as monitoring will be almost impossible (e.g. regulating cars being washed in front of homes and people cleaning off paint brushes).	Retain as notified.
S240.062	9 Te Awarua-o-Porirua Whaitua	Rule P.R2: Stormwater to land - permitted activity.	Amend	Supports in principle but notes territorial authorities control new connections to discharge to the network. Concerned that as written, this rule requires all new connections to the stormwater network to obtain a regional resource consent. It is unclear why this needs to now be regulated by the Regional Council, and this is possibly a drafting error. Considers the rule duplicates P.R3 to a large extent as they both control storm water to land/water with similar conditions.	Consolidate P.R2 and P.R3 into one rule, or amend as follows: Rule P.R2: Stormwater to land - permitted activity The discharge of stormwater onto or into land, including where contaminants may enter groundwater (a) that is not from a high risk industrial or trade premise, or (b) **that is not connected to** ~~that does not discharge from, or to,~~ a local authority stormwater network is a permitted activity provided the following conditions are met: (...)
S240.063	9 Te Awarua-o-Porirua Whaitua	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Amend	Supports in principle but notes territorial authorities control new connections to discharge to the network. Concerned that as written, this rule requires all new connections to the stormwater network to obtain a regional resource consent. It is unclear why this needs to now be regulated by the Regional Council, and this is possibly a drafting error. Considers the rule duplicate P.R2 to a large extent as they both control storm water to land/water with similar conditions.	Consolidate P.R2 and P.R3 into one rule, or amend as follows: Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity The discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, from an existing individual property (a) that is not from a high risk industrial or trade premise, or (b) that is not from a state highway, or (c) **that is not connected to** ~~that does not discharge from, or to,~~ a local authority stormwater network

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					is a permitted activity provided the following conditions are met: (...)
S240.064	9 Te Awarua-o-Porirua Whaitua	Rule P.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Support	Supports in principle.	Retain as notified.
S240.065	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Generally supports Greater Wellington taking a greater role in regulating changes in impervious surfaces and requiring interventions, but notes that the 30sqm threshold in this rule for requiring hydrological controls for any impervious surfaces is a low threshold and will impact the cost of development and create a regulatory burden on GWRC. Notes the rule does not outline what types of hydrological controls should be implemented and it is unclear what would be considered an acceptable solution to comply with the provisions. Notes the definition of 'hydrological control' doesn't provide any guidance in this regard and considers the s32 Evaluation does not outline the costs of acceptable controls and the economic impact on urban development. Suggests a possible solution for a hydrological control, at least for new buildings, are rainwater tanks. Notes that the District Plan requires that rain tanks be installed on new residential buildings that comply with Wellington Water's guide 'Managing Stormwater Runoff' which only sets the sizes for	Develop an acceptable solution for compliance with WH.R5(c)(ii) either though incorporating guidance by reference, within the rule itself, or as an appendix to the plan. Amend the rule as follows and/or delete WH.R5(c)(ii): Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment ~~activities of existing urbanised property)~~ and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or new local authority stormwater network, that is not a high risk industrial or trade premise or unplanned greenfield development, is a permitted activity, provided the following conditions are met: (a) the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m2 (baseline property existing impervious area as at 30 October 2023) and (b) all new building materials associated with the development shall not include exposed zinc (including

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				rainwater tanks for buildings with a roof area larger than 40sqm. As this is the only acceptable solution known to Council for hydrological controls, it is recommended that the threshold start at 40sqm at a minimum. Considers more guidance for plan users on how they can comply with the rule, either though incorporating guidance by reference, within the rule itself, or as an appendix to the plan, is needed for successful implementation. Notes the s32 Evaluation does not outline the costs to GW to monitor compliance with this rule and considers the term "an existing urbanised property" is not necessary as this is outlined in the definition of redevelopment. Seeks changes to enable Parks & City Services Team to carry out their business-as-usual activities in line with the Proposed District Plan for Porirua noting most earthworks activities carried out are carried out in the context of open space and in sensitivity to the environment in accordance with the Reserves Act 1977. Considers this distinct from the activities that this rule is designed to control. Notes that construction, operation, and maintenance earthworks activities carried out by the Parks & City Services Team are generally low-risk in terms of environmental impacts, and there is difficulty siting permanent hydrological control in reserves that have limited flat land and competing uses. Further notes that the land on which reserves are situated usually has a lot of porous surfaces such as grass and vegetation, mitigating the need for on-site hydrological control. Considers that this level of hydrological control is not required on reserve land.	galvanised steel) or copper roof, cladding and spouting materials, and (c) the proposal provides hydrological control measures ~~(for example rain tanks)~~ onsite or offsite, where discharges will enter a surface water body (including via an existing local authority stormwater network): (i) for all impervious areas associated with a greenfield development, or (ii) for all redeveloped and new impervious areas involving greater than **40**~~30~~m2 of impervious area of a redevelopment ~~(an existing urbanised property),~~ and (...) **Note: this rule does not apply to the construction, operation, and maintenance of tracks, boardwalks, and playground equipment on land managed under the Reserves Act 1977'**

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S240.066	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Generally supports GW taking a greater role in regulating changes in impervious surfaces and requiring interventions, but note that this rule will have a significant economic impact on urban development and create a regulatory burden on GWRC. Notes the rule does not outline what types of hydrological controls should be implemented and it is unclear what would be considered an acceptable solution to comply with the provisions, and the definition of 'hydrological control' doesn't provide any guidance in this regard. Notes the second matter of control refers to best practicable options, but it does not outline what these are (as opposed to stormwater treatment system which has some guidance on acceptable types of systems in the definition along with specifications in Schedule 28) The s32 Evaluation does not quantify the costs of acceptable controls and the economic impact on urban development.	Develop an acceptable solution for compliance either through incorporating guidance by reference, within the rule itself, or as an appendix to the plan.
S240.067	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas-controlled activity.	Amend	Generally supports GW taking a greater role in regulating changes in impervious surfaces and requiring interventions, but note that this rule will have a significant economic impact on urban development and create a regulatory burden on GWRC. Notes the rule does not outline what types of hydrological controls should be implemented and it is unclear what would be considered an acceptable solution to comply with the provisions, and the definition of 'hydrological control' doesn't provide any guidance in this regard. Notes the second matter of control refers to best practicable options, but it does not outline what these are (as opposed to stormwater treatment	Develop an acceptable solution for compliance either through incorporating guidance by reference, within the rule itself, or as an appendix to the plan.

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				system which has some guidance on acceptable types of systems in the definition along with specifications in Schedule 28) The s32 Evaluation does not quantify the costs of acceptable controls and the economic impact on urban development.	
S240.068	9 Te Awarua-o-Porirua Whaitua	Rule P.R9: Stormwater from new state highways-discretionary activity.	Amend	Considers it unclear what constitutes a new state highway. For example, it is unclear if a slight widening of seal on shoulders would be considered new state highway, or is this intended to capture entirely new stretches of state highway.	Review rule wording.
S240.069	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Support	Supports this policy, including reference to a schedule setting out requirements for a stormwater impact assessment.	Retain as notified.
S240.070	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Amend	Considers prohibition of unplanned greenfield development may result in unintended consequences with no consenting pathway to consider a proposal located in these areas that may have positive outcomes, including positive outcomes for freshwater. Considers the activity status is a blunt instrument that would also make an incursion into these areas prohibited no matter how small. For example a new road connecting urban areas (or urban to rural areas) would be prohibited if it needed to "clip" an area mapped as unplanned. Considers policy direction should be amended to	Amend rule as follows: Rule P.R12: Stormwater discharges from new unplanned greenfield development - prohibited activity The use of land and the associated discharge of stormwater from impervious surfaces from unplanned greenfield development direct into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or proposed stormwater network, is a ~~prohibited~~ **non-complying** activity.

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				"avoid" with a non-complying activity status. Notes the application of a prohibited activity status requires a high level of evaluation to justify its use and considers that the s32 Evaluation is insufficient. Considers the s32 Evaluation contains contradictory statements with regard to the ability of PC1 to mitigate contaminants from urban developments. Questions how a prohibited activity status could be justified on an effects management basis if PC1 manages all water quality effects, including residual effects as stated in the s32. Considers the prohibition on greenfield development is inconsistent with the NPS-UD. Considers Map 86 is inconsistent with the decisions on the Proposed Porirua District Plan. In some instances the unplanned area includes areas confirmed as Future Urban Zone including in Waitangirua, Pukerua Bay and Judgeford. There are also parts of Judgeford that were not rezoned as Future Urban Zone due to natural hazard risk. Considers the avoid/prohibited approach may directly conflict with Council's ability to give effect to the NPS-UD. Concerned Hongoeka has been identified as an area of unplanned urban development, meaning any greenfield development in this area is prohibited. This will likely be of concern to Hongoeka Whanau. Hongoeka is partly urban in nature in terms of lots sizes, and has reticulated sewerage and drinking water supply. Council worked in partnership with Te Rūnanga and with the Hongoeka Marae Committee on creating an enabling zoning for this area in the PDP. Considers a prohibited activity status makes it difficult for territorial authorities to consider a plan change in an unplanned greenfield area as per Policy 8 of the NPS-UD. Concerned about having to undertake two plan	

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				changes (both a district and regional plan change) would be an administrative and financial impediment to urban development and the economic impact of having to undertake two parallel plan changes has not been fully assed in the s32 with regard to the NPS-UD, or in terms of the impact on housing and business capacity. States intent of P.P2(b) is unclear and is inconsistent with and duplicates (c) and (d). Supports the regulation of contaminant discharges from redevelopment activities, and considers that the "encouraging" policy direction is inconsistent with the "imposing" and "requiring" policy direction in (c) and (d).	
S240.071	9 Te Awarua-o-Porirua Whaitua	Rule P.R13: Wastewater network catchment discharges to water - restricted discretionary activity.	Amend	Supports in principle the maintenance and improvement of wastewater discharges, subject to relief sought in regard to target attribute states for E.coli in Table 9.1 and 9.2.	Retain as notified provided target attribute states for E.coli amended to 2060 in Table 9.1 and 9.2.
S240.072	9 Te Awarua-o-Porirua Whaitua	Rule P.R14: Existing wastewater discharges from a treatment plant to coastal and freshwater -	Support	Support.	Retain as notified

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		discretionary activity.			
S240.073	9 Te Awarua-o-Porirua Whaitua	Rule P.R15: All other discharges of wastewater - non-complying activity.	Support	Support.	Retain as notified
S240.074	9 Te Awarua-o-Porirua Whaitua	Rule P.R16: Vegetation clearance on highest erosion risk land-permitted activity.	Amend	Supports in principle the reduction of sediment discharges from forestry but considers there is a need to provide for the creation of firebreaks as a permitted activity to allow people to defend their homes and property from the risk of wildfires.	Rule P.R16: Vegetation clearance on highest erosion risk land - permitted activity Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a surface water body is a permitted activity provided the following conditions are met: (a) the vegetation clearance is: (i) to implement an action in the erosion risk treatment plan for the farm, or (ii) for the control of pest plants, **or** **(iii) for the creation or maintenance of a firebreak;** and (b) debris from the vegetation clearance is not placed where it can enter a surface water body.
S240.075	9 Te Awarua-o-Porirua Whaitua	Rule P.R17: Vegetation clearance on highest erosion risk land - controlled activity.	Support	Supports reduction of sediment discharges from forestry.	Retain as notified
S240.076	9 Te Awarua-o-Porirua Whaitua	Rule P.R18: Vegetation clearance -	Support	Supports reduction of sediment discharges from forestry.	Retain as notified

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		discretionary activity.			
S240.077	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry - controlled activity.	Support	Supports reduction of sediment discharges from forestry.	Retain as notified
S240.078	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry - discretionary activity.	Support	Supports reduction of sediment discharges from forestry.	Retain as notified
S240.079	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity.	Support	Supports reduction of sediment discharges from forestry.	Retain as notified
S240.080	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Support	Concerned the 'and' after clause b means that any earthworks City-wide that aren't on a farm technically require consent no matter how small. This is unlikely the intent of the rule and is likely a drafting error. Notes the earthworks definition is aligned with the National Planning Standards and this removes an exemption for road maintenance activities. Considers they should be exempt to remove the need to apply for unnecessary consents which will add costs and delays to the road maintenance programme. Considers exclusion should be in the rule itself to comply with the National Planning Standards. Concerns earthwork consents required for coastal	Amend rule as follows: Rule P.R22: Earthworks - permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, ~~and~~ **or** (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and

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				restoration, conservation, and management activities will discourage projects and work against coastal resilience and enhancement. Notes soft engineering approaches to coastal protection, in particular, placement of compacted fill, are increasingly used as the effects of sea level rise start to impact coastlines and compacted fill is low impact relative to rock armouring and other coastal protection methods. Excluding these activities will enable soft engineering approaches to be undertaken without the need to apply for consents which will add significant costs and delays to Council's coastal adaptation programme. Considers this approach is consistent with the Proposed Porirua District Plan and the New Zealand Coastal Policy statement.	(e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note-**This rule excludes coastal restoration, conservation, and management activities where undertaken by a statutory authority or their nominated contractor.** **-This rule excludes repair or maintenance of existing roads, or repair, sealing or resealing of a road, footpath or driveway where undertaken by a statutory authority or their nominated contractor.** -Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).
S240.081	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Amend	Notes the s32 evaluation states there is higher risk for discharges of sediment from earthworks over the winter period. Considers large storm events cause larger pulses of sediment discharges and that large storm events are becoming more unpredictable and can occur anytime throughout the year. Notes a poor summer earthworks season due to adverse weather may result in significant lost time to safely undertake earthworks, and the winter period may be appropriate for projects to catch up on progress and stabilise the land.	Amend rule as follows: Rule P.R23: Earthworks - restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers the BAU approach for winter earthworks should be maintained, i.e. as a standard condition of consent as a discretionary activity as these conditions allow for GW to provide permits to undertake earthworks within this period as appropriate and subject to conditions.	of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~
S240.082	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks - non-complying activity.	Support	Support in principle	Retain as notified
S240.083	9 Te Awarua-o-Porirua Whaitua	Rule P.R25: Farming activities on properties of between 4 hectares and 20 hectares - permitted activity.	Support	Generally supports reducing diffuse discharges from farming activities. Considers associated rules regulating nitrogen discharges from smaller properties will create a regulatory burden for landowners. Greater Wellington needs to ensure that resources dedicated to this process do not come at the expense of other programmes that may have a greater impact on water quality elsewhere in the catchment.	Not stated
S240.084	13 Maps	Map 86: Unplanned greenfield areas - Porirua City Council.	Amend	Considers Map 86 is inconsistent with the decisions on the Proposed Porirua District Plan. In some instances the unplanned area includes areas confirmed as Future Urban Zone including in Waitangirua, Pukerua Bay and Judgeford. There are also parts of Judgeford that were not rezoned as Future Urban Zone due to natural hazard risk. Considers the avoid/prohibited approach may directly conflict with Council's ability to give effect to the NPS-UD.	Amend map to reflect decisions version of the planning maps in the Proposed Porirua District Plan. Include the Hongoeka Māori Purpose Zone within the Planned/existing urban area.

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				Concerned that Hongoeka has been identified as an area of unplanned urban development, meaning any greenfield development in this area is prohibited but notes Hongoeka is partly urban in nature in terms of lots sizes, and has reticulated sewerage and drinking water supply. Notes Council worked in partnership with Te Rūnanga and with the Hongoeka Marae Committee on creating an enabling zoning for this area in the PDP.	

S165 PUKERUA HOLDINGS LIMITED

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S165.001	General comments	General comments - overall	Oppose	Opposes: 1. The entirety of PC1; and specifically: 2. Amendments to definitions; 3. Amendments to Chapters 5.2 and 5.3 - Discharges to land and water and Land use rules; 4. New Chapter 8 - Whaitua Te Whanganui-a-Tara 5. New Chapter 9 - Te Awarua-o-Porirua 6. Amendments to schedules 7. Amendments to maps	Seeks the following amendments to PC1: 1. Withdrawal of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks); OR 2. Should the relief sought in point 1) not occur, the relief sought set in relation to specific provisions of PC1 as set out in Section 3 of the original submission; AND 3. Any other relief (including consequential relief) to give effect to the decisions sought in relation to specific provisions of PC1 as set out in Section 3 of the original submission.
S165.002	General comments	General comments - overall	Oppose	Concerned about the unintended consequences of several drafting errors given the provisions took immediate legal effect at notification. Notes that responses to questions raised at the Q&A sessions are still pending and the application and interpretation of provisions remain in a state of flux	Seeks the following amendments to PC1: 1. Withdrawal of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks); OR 2. Should the relief sought in point 1) not occur, the Submitter seeks the relief sought in relation to specific provisions of PC1 as set out in Section 3 of the original submission; AND 3. Any other relief (including consequential relief) to give

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					effect to the decisions sought in relation to specific provisions of PC1 as set out in Section 3 of the original submission.
S165.003	General comments	General comments - economic cost/impact	Oppose	Concerns PC1 will impact housing affordability negatively. Opposes schedule 30 and associated provisions. Consider the financial contribution burdensome and may impede on urban growth and intensification. Concerned PC1 and supporting documentation fail to assess the impact on landowners and developers, potentially impacting the private sector's commercial viability. Opposes a flat fee without evaluation, as it risks incentivising the provision of large lots over intensification, undermining Objective 2 and associated policies of the NPS-UD, which were not addressed in the Section 32 Report. Concerns about reliance on financial contributions vs alternative solutions within policy. Considers proposed financial contribution to offset residual stormwater deterioration should not be the only option, despite NPS prioritising water quality. Considers that Schedule 30 highlights the collection of funds for catchment-scale stormwater treatment systems, but the feasibility, effectiveness, and timing of such systems remain unclear. The submitter opposes the proposal from GWRC that this fee would be mandatory even if a development achieves greater than 85% reduction in wastewater, a stance strongly opposed as lacking proportionality and any effects-based rationale.	Seeks the following amendments to PC1: 1. Withdrawal of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks); OR 2. Should the relief sought in point 1) not occur, the Submitter seeks the relief set in relation to specific provisions of PC1 as set out in Section 3 of the original submission; AND 3. Any other relief (including consequential relief) to give effect to the decisions sought in relation to specific provisions of PC1 as set out in Section 3 of the original submission.
S165.004	General comments	General comments - earthworks	Oppose	Opposes the non-complying resource consent requirement for winter earthworks and instead seeks the existing approach to managing winter earthworks be retained because it has proven effective. Considers it is inappropriate to applying a blanket non-complying activity status for winter works, instead assessing the project's pre-winter track record and factors such as scale, nature, duration of the works and management of works	The Submitter seeks the following amendments to PC1: 1. Withdrawal of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks); OR 2. Should the relief sought in point 1) not occur, the Submitter seeks the relief set in relation to specific provisions of PC1 as set out in Section 3 of the original submission; AND

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				already undertaken in the applicable site. Concerns the requirement to stabilise earthworks against erosion and implement sediment controls before shutting down may not be feasible, potentially leading to unintended environmental consequences. Concerned a blanket shutdown period may not align with the diverse challenges of different sites and areas. Considers if an applicant demonstrates the ability to manage winter works effectively, such instances should be supported to prevent unnecessary delays in housing supply and delivery	3. Any other relief (including consequential relief) to give effect to the decisions sought in relation to specific provisions of PC1 as set out in Section 3 of the original submission.
S165.005	General comments	General comments - unplanned greenfield development	Oppose	Considers that as the section 32 evaluation suggests all contaminants can be addressed through a combination of treatment and financial contributions, the prohibited activity classification is inappropriate from effects management standpoint and lacks justification' Considers that the requirements for both a regional and district plan change for greenfield development pose significant challenges to the private sector's responsiveness to housing needs, making it onerous and costly. Considers this approach could impact the economic viability of development hinder the supply of affordable housing.	Seeks the following amendments to PC1: 1. Withdrawal of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks); OR 2. Should the relief sought in point 1) not occur, the Submitter seeks the relief sought out in Sin relation to specific provisions of PC1 as set out in Section 3 of the original submission; AND 3. Any other relief (including consequential relief) to give effect to the decisions sought in relation to specific provisions of PC1 as set out in Section 3 of the original submission.
S165.006	General comments	General comments - stormwater management	Oppose	Considers PC1 lacks sufficient detail about what types of hydrological controls and water-sensitive design required for different types/scales of development. Considers requiring the treatment of all impervious surfaces is a big financial burden to owners, simultaneously reducing the need for the treatment of areas due to control of building materials. Concerned that the conditions in the standards pose significant burdens on property owners as a whole. Concerned that the Permitted activity rule that impervious surfaces less than 30m² should necessitate engineering advice for the design of site-specific controls. Concerns about	Seeks the following amendments to PC1: 1. Withdrawal of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks); OR 2. Should the relief sought in point 1) not occur, the Submitter seeks the relief sought in relation to specific provisions of PC1 as set out in Section 3 of the original submission); AND 3. Any other relief (including consequential relief) to give effect to the decisions sought in Section 3 of the original submission

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				implications for facilitating necessary urban growth. Concerns that PC1 lacks consideration for financial costs and impacts on the commercial viability of housing supply.	
S165.007	2 Interpretation	Hydrological control	Amend	Concerned the definition does not outline what the controls are	Amend definition to outline what hydrological controls are, including examples and a schedule with technical standards.
S165.008	2 Interpretation	Impervious surfaces	Amend	Considers a roof with rainwater collection that complies with hydraulic neutrality rules in district plans should not be considered impervious surfaces. Implementing grey water reuse would add to development costs and is not a requirement of any regulation including PC1 or the NRP.	Amend definition as follows: Surfaces that prevent or significantly impede the infiltration of **stormwater** into soil or the ground, includes: roofs, paved areas (including sealed/compacted metal) such as roads, driveways, parking areas, sidewalks/foot paths or patios, and excludes: grassed areas, gardens and other vegetated areas, porous or permeable paving, slatted decks which allow water to drain through to a permeable surface, porous or permeable paving and living roofs, roof areas with rainwater collection ~~and reuse, any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)~~
S165.009	2 Interpretation	Redevelopment	Amend	Considers this definition should exclude extension to existing buildings to allow a baseline for small redevelopment of existing sites as a permitted activity in associated rules.	Amend definition as follows: For the purpose of assessment of a proposal involving the redevelopment of an existing urbanised property (i.e including brownfield development upgrades to existing roads etc.) in relation to stormwater effects. This includes the replacement, reconstruction or addition (new) of impervious surfaces. Excludes: minor maintenance or repairs to roads, carparking areas, driveways and paving, installation, maintenance or repair of underground infrastructure or network utilities requiring trenching and resurfacing, activities that only involve the re-roofing of existing buildings, ~~extensions to existing buildings~~
S165.010	2 Interpretation	Unplanned greenfield development	Oppose	Opposes the definition as it relates to associated prohibited activity rules that are opposed	Delete definition
S165.011	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities	Amend	Opposes the unplanned greenfield growth policy and rules. Prohibited activity status provides no consenting pathway for proposals in these areas, even if they would have better outcomes for the community and freshwater than intensive rural	Amend policy as follows and make any other consequential relief necessary to give effect to this submission point: Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		to achieve target attribute states and coastal water objectives.		activities. Notes that the section 32 report appears to state that all contaminants can be mitigated with a combination of treatment and the use of financial contributions (refer paragraph 64 of Part C) and considers that, if this is the case, the prohibited activity status is inappropriate in terms of effects management. Also considers the prohibited activity status is inconsistent with the NPS-UD, in particular Policy 8. Concerned about requiring district and regional plan changes and the significant time and cost associated with this. Concerns about the effects of two plan changes making it difficult to be responsive in providing housing and the economic viability of development.	discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (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,~~
S165.012	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	Amend	Considers PC1 lacks sufficient detail around what types of hydrological controls and water-sensitive design are required for different types/scales of development. Concerned the conditions outlined in subsections (a),(b), and (c) may pose significant financial burdens on property owners and developers. Concerned the policy's focus on communal stormwater treatment systems within a catchment or sub-catchment, as laid out in (c), may also not be achievable in all scenarios. Considers that as there is a permitted activity rule for impervious surfaces as small as 30m2, the creation of these small areas of impervious surfaces should not have to seek engineering advice to design site-specific controls. Considers the S32 assessment does not adequately assess the costs and impacts on broader urban growth and supply of housing in the region.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.
S165.013	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant	Oppose	Opposes the new framework relating to financial contributions in section 30. Concerned that financial contributions will hinder greenfield developments, impact housing availability and affordability, and PC1 does not assess these costs. Concerned mandatory blanket financial contribution will	Delete policy

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		offsetting for new greenfield developm ent.		incentivise the development of large lots rather than intensification. Considering that acknowledging stormwater contamination is only practicable for a portion of the contaminant load shows the limitations of the proposed solution. Concerned stormwater contaminant treatment shows an overreliance on financial contribution without adequately exploring alternatives. as land use changes could improve water quality. Considers the proposed financial contribution to offset residual stormwater deterioration should not be the only option and is not the most equitable or efficient approach. Considers anticipating potential water quality deterioration, as outlined in Policy WH.P15 and P.P13, should prompt a more comprehensive exploration of solutions beyond relying solely on financial contributions. Considers the feasibility, timing and effectiveness of catchment-scale stormwater treatment systems unclear. Strongly opposes the application of a mandatory fee even if a development achieves greater than 85% reduction. Considers the proposed contribution is inconsistent with the purported purpose outlined by the GWRC.	
S165.014	8 Whaitua Te Whangan ui-a-Tara	Policy WH.P16: Stormwate r discharges from new unplanned greenfield developm ent.	Oppose	Opposes the avoidance/prohibiting approach to greenfield development. Concerned this activity status would provide no pathway for a proposal even if it had positive impacts on the community or freshwater. Considers the use of a prohibited activity status is not consistent with the NPS-UD as outlined above in this submission.	Delete definition
S165.015	8 Whaitua Te Whangan ui-a-Tara	Policy WH.P31: Winter shut down	Oppose	Opposes the requirement to seek a non-complying resource consent to undertake winter earthworks. Considers large rain events that produce larger sediment pulses can occur any time, not just in the	Delete policy: ~~Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		of earthwork s.		winter period. Considers the current practice for managing winter earthworks should be retained and requiring a non-complying activity status for winter works does not take into account the scale, nature or duration of the works or site-specific conditions. Also concerned that stabilising earthworks prior to the shutdown may not always be feasible and may lead to perverse environmental outcomes. Considers blanket restrictions are not the most effective approach to address site-specific challenges nd where an applicant shows they can meet winter work requirements, they should be approved to avoid housing supply delay.	~~have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).~~
S165.016	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Amend	Notes that territorial authorities control new connections to discharge to the network and considers the rule as written will require all new connections to the stormwater network to obtain a regional resource consent.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule WH.R2: Stormwater to land - permitted activity The discharge of stormwater onto or into land, including where contaminants may enter groundwater: (a) that is not from a high risk industrial or trade premise, or (b) **that is not connected to** ~~that does not discharge from, or to,~~ a local authority stormwater network, is a permitted activity provided the following conditions are met: (...)
S165.017	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Amend	Notes that territorial authorities control new connections to discharge to the network and considers the rule as written will require all new connections to the stormwater network to obtain a regional resource consent.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity The discharge of stormwater from an existing individual property into water, or onto or into land where it may enter a surface water body or coastal water, (a) that is not from a high risk industrial or trade premise, or (b) that is not from a port, airport or state highway, or (c) **that is not connected to** ~~does not discharge from, or to,~~ a local authority stormwater network, is a permitted activity, provided the following conditions are met: (...)
S165.018	8 Whaitua Te	Rule WH.R5: Stormwate	Amend	Considers PC1 lacks sufficient detail around what types of hydrological controls and water-sensitive design are required for different types/scales of	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	r from new and redeveloped impervious surfaces - permitted activity.		development and concerns about financial burdens. Concerned the policy's focus on communal stormwater treatment systems within a catchment or sub-catchment, as laid out in (c), may also not be achievable in all scenarios. Considers that as there is a permitted activity rule for impervious surfaces as small as 30m2, the creation of these small areas of impervious surfaces should not have to seek engineering advice to design site-specific controls. Concerned the S32 assessment does not adequately assess the costs and impacts on broader urban growth needed.	
S165.019	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Considers PC1 lacks sufficient detail around what types of hydrological controls and water-sensitive design are required for different types/scales of development and concerns about financial burdens. The policy's focus on communal stormwater treatment systems within a catchment or sub-catchment, as laid out in (c), may also not be achievable in all scenarios. Permitted impervious surfaces less than 30m2 also should not have to seek engineering advice to design site-specific controls. Concerned the S32 assessment does not adequately assess the costs and impacts on broader urban growth needed.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.
S165.020	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas -	Amend	Considers PC1 lacks sufficient detail around what types of hydrological controls and water-sensitive design are required for different types/scales of development and concerns about financial burdens. The policy's focus on communal stormwater treatment systems within a catchment or sub-catchment as laid out in (c) may also not be achievable in all scenarios. Permitted impervious surfaces less than 30m2 also should not have to seek engineering advice to design site-specific controls. Concerned the S32 assessment does not adequately assess the costs and impacts on broader urban growth needed.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		controlled activity.			
S165.021	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Amend	Opposes financial contributions to residual stormwater contaminants. Considers the framework fails to recognise that greenfield developments may result in improved contaminant discharges. Considers the imposition of financial contributions places the burden on developers and may hinder housing and urban growth and further exacerbating housing affordability and supply issues.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or Rule WH.R7, or prohibited under WH.R13 is a discretionary activity provided the following conditions are met: (a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), and ~~(b) if the proposal is for greenfield development a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions).~~
S165.022	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Amend	Opposes the avoidance/prohibiting approach to greenfield development. Concerned this activity status would provide no pathway for a proposal even if it had positive impacts on the community or freshwater. Notes the use of a prohibited activity status is not consistent with the NPS-UD as outlined above in this submission.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule WH.R12: All other stormwater discharges - non-complying activity The: (a) discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule WH.R2, or (b) discharge of stormwater into water or onto or into land where it may enter a surface water body or coastal water, that is not permitted by Rule WH.R3, or a restricted discretionary activity under Rules WH.R8 or WH.R9, or (c) discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule WH.R4, or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade premise that does not meet the conditions

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					of Rule WH.R11, or (d) use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater into water or onto or into land where it may enter water, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or WH.R7, or a discretionary activity under Rule WH.R10 or WH.R11, ~~or a prohibited activity under WH.R13,~~ is a non-complying activity.
S165.023	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Opposes the avoidance/prohibiting approach to greenfield development. Concerned this activity status would provide no pathway for a proposal even if it had positive impacts on the community or freshwater. Notes the use of a prohibited activity status is not consistent with the NPS-UD as outlined above in this submission.	Delete rule
S165.024	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	Notes the 'and' after clause b means that any earthworks that are not on a farm now require consent which is unlikely the intent of the rule.	Amend rule as follows: Rule WH.R23: Earthworks - permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, ~~and~~ **or** (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122,R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).
S165.025	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	Opposes the requirement to seek a non-complying resource consent to undertake winter earthworks. Considers large rain events that produce larger sediment pulses can occur any time, not just in the winter period. Considers the current practice for managing winter earthworks should be retained and requiring a non-complying activity status for winter works does not take into account the scale, nature or duration of the works or site-specific conditions. Also concerned that stabilising earthworks prior to the shutdown may not always be feasible and may lead to perverse environmental outcomes. Considers blanket restrictions are not the most effective approach to address site-specific challenges nd where an applicant shows they can meet winter work requirements, they should be approved to avoid housing supply delay	water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and ~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~
S165.026	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal	Amend	Opposes the unplanned greenfield growth policy and rules. Prohibited activity status provides no consenting pathway for proposals in these areas, even if they would have better outcomes for the community and freshwater than intensive rural activities. Notes that the section 32 report appears to state that all contaminants can be mitigated with a combination of treatment and the use of financial contributions (refer paragraph 64 of Part C) and considers that, if this is the case, the prohibited	Amend policy as follows and make any other consequential relief necessary to give effect to this submission point: Policy P.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (a) ~~prohibiting unplanned greenfield development and for other greenfield developments~~ minimising ~~the~~ contaminants **from greenfield developments** ~~and requiring financial~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		water objectives.		activity status is inappropriate in terms of effects management. Also considers the prohibited activity status is inconsistent with the NPS-UD, in particular Policy 8. Concerned about requiring district and regional plan changes and the significant time and cost associated with this. Concerns about the effects of two plan changes making it difficult to be responsive in providing housing and the economic viability of development.	~~contributions as to offset adverse effects from residual stormwater contaminants,~~ and (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers, and (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.
S165.027	9 Te Awarua-o-Porirua Whaitua	Policy P.P10: Managing adverse effects of stormwater discharges.	Amend	Considers PC1 lacks sufficient detail around what types of hydrological controls and water-sensitive design are required for different types/scales of development and concerns about financial burdens. The policy's focus on communal stormwater treatment systems within a catchment or sub-catchment as laid out in (c) may also not be achievable in all scenarios. Permitted impervious surfaces less than 30m2 also should not have to seek engineering advice to design site-specific controls. Concerned the S32 assessment does not adequately assess the costs and impacts on broader urban growth needed.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.
S165.028	9 Te Awarua-o-Porirua Whaitua	Policy P.P14: Stormwater contaminant offsetting for new greenfield	Oppose	Considers PC1 lacks sufficient detail around what types of hydrological controls and water-sensitive design are required for different types/scales of development and concerns about financial burdens. The policy's focus on communal stormwater treatment systems within a catchment or sub-catchment, as laid out in (c), may also not be achievable in all scenarios. Permitted impervious surfaces less than 30m2 also should not have to	Delete policy

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		developm ent.		seek engineering advice to design site-specific controls. Concerned the S32 assessment does not adequately assess the costs and impacts on broader urban growth needed.	
S165.029	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwate r discharges from new unplanned greenfield developm ent.	Oppose	Opposes financial contributions to residual stormwater contaminants. Considers the framework fails to recognise that greenfield developments may result in improved contaminant discharges. Considers the imposition of financial contributions places the burden on developers and may hinder housing and urban growth and further exacerbating housing affordability and supply issues.	Delete policy
S165.030	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthwork s.	Oppose	Opposes the requirement to seek a non-complying resource consent to undertake winter earthworks. Considers large rain events that produce larger sediment pulses can occur any time, not just in the winter period. Considers the current practice for managing winter earthworks should be retained and requiring a non-complying activity status for winter works does not take into account the scale, nature or duration of the works or site-specific conditions. Also concerned that stabilising earthworks prior to the shutdown may not always be feasible and may lead to perverse environmental outcomes. Considers blanket restrictions are not the most effective approach to address site-specific challenges nd where an applicant shows they can meet winter work requirements, they should be approved to avoid housing supply delay.	Delete policy
S165.031	9 Te Awarua-o-Porirua Whaitua	Rule P.R2: Stormwate r to land - permitted activity.	Amend	Notes that territorial authorities control new connections to discharge to the network and considers the rule as written will require all new connections to the stormwater network to obtain a regional resource consent.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule P.R2: Stormwater to land - permitted activity The discharge of stormwater onto or into land, including where contaminants may enter groundwater (a) that is not from a high risk industrial or trade premise, or (b) **that is not connected to** ~~that does not discharge from, or to,~~ a local

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					authority stormwater network is a permitted activity provided the following conditions are met: (...)
S165.032	9 Te Awarua-o-Porirua Whaitua	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Amend	Notes that territorial authorities control new connections to discharge to the network and considers the rule as written will require all new connections to the stormwater network to obtain a regional resource consent.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity The discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, from an existing individual property (a) that is not from a high risk industrial or trade premise, or (b) that is not from a state highway, or (c) **that is not connected to** ~~that does not discharge from, or to,~~ a local authority stormwater network is a permitted activity provided the following conditions are met: (...)
S165.033	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Considers PC1 lacks sufficient detail around what types of hydrological controls and water-sensitive design are required for different types/scales of development and concerns about financial burdens. Concerned the policy's focus on communal stormwater treatment systems within a catchment or sub-catchment, as laid out in (c), may also not be achievable in all scenarios. Considers that as there is a permitted activity rule for impervious surfaces as small as 30m2, the creation of these small areas of impervious surfaces should not have to seek engineering advice to design site-specific controls. Concerned the S32 assessment does not adequately assess the costs and impacts on broader urban growth needed.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.
S165.034	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Considers PC1 lacks sufficient detail around what types of hydrological controls and water-sensitive design are required for different types/scales of development and concerns about financial burdens. The policy's focus on communal stormwater treatment systems within a catchment or sub-catchment as laid out in (c) may also not be achievable in all scenarios. Permitted impervious surfaces less than 30m2 also should not have to	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				seek engineering advice to design site-specific controls. Concerned the S32 assessment does not adequately assess the costs and impacts on broader urban growth needed.	
S165.035	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas-controlled activity.	Amend	Considers PC1 lacks sufficient detail around what types of hydrological controls and water-sensitive design are required for different types/scales of development and concerns about financial burdens. The policy's focus on communal stormwater treatment systems within a catchment or sub-catchment as laid out in (c) may also not be achievable in all scenarios. Permitted impervious surfaces less than 30m2 also should not have to seek engineering advice to design site-specific controls. Concerned the S32 assessment does not adequately assess the costs and impacts on broader urban growth needed.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.
S165.036	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Amend	Considers PC1 lacks sufficient detail around what types of hydrological controls and water-sensitive design are required for different types/scales of development and concerns about financial burdens. The policy's focus on communal stormwater treatment systems within a catchment or sub-catchment, as laid out in (c), may also not be achievable in all scenarios. Permitted impervious surfaces less than 30m2 also should not have to seek engineering advice to design site-specific controls. Concerned the S32 assessment does not adequately assess the costs and impacts on broader urban growth needed.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule P.R10: Stormwater from new and redeveloped impervious surfaces - discretionary activity The use of land for the creation of new or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including via an existing local authority stormwater network, that is not permitted by Rule P.R5, or a controlled activity under Rule P.R6 or Rule P.R7, or prohibited under P.R12 is a discretionary activity provided the following conditions are met: (a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), and ~~(b) if the proposal is for greenfield development, a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions).~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S165.037	9 Te Awarua-o-Porirua Whaitua	Rule P.R11: All other stormwater discharges - non-complying activity.	Amend	Opposes financial contributions to residual stormwater contaminants. Considers the framework fails to recognise that greenfield developments may result in improved contaminant discharges. Considers the imposition of financial contributions places the burden on developers and may hinder housing and urban growth and further exacerbating housing affordability and supply issues.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule P.R11: All other stormwater discharges - non-complying activity The: (a) discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule P.R2, or (b) discharge of stormwater into water or onto or into land where it may enter water, that is not permitted by Rule P.R3, or a restricted discretionary activity under Rule P.R8, or (c) discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule P.R4, or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade premise that does not meet the conditions of Rule P.R10, or (d) use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater water or onto or into land where it may enter water, that is not permitted by Rule P.R5, or a controlled activity under Rules P.R6 or P.R7, or a discretionary activity under Rule P.R9, ~~or a prohibited activity under Rule P.R12,~~ is a non-complying activity.
S165.038	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Oppose	Opposes financial contributions to residual stormwater contaminants. Considers the framework fails to recognise that greenfield developments may result in improved contaminant discharges. Considers the imposition of financial contributions places the burden on developers and may hinder housing and urban growth and further exacerbating housing affordability and supply issues.	Delete rule: ~~Rule P.R12: Stormwater discharges from new unplanned greenfield development - prohibited activity The use of land and the associated discharge of stormwater from impervious surfaces from unplanned greenfield development direct into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or proposed stormwater network, is a prohibited activity.~~
S165.039	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks -	Amend	Notes the 'and' after clause b means that any earthworks that are not on a farm now require consent which is unlikely the intent of the rule.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule P.R22: Earthworks - permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, ~~and~~ **or** (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).
S165.040	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Amend	Opposes the requirement to seek a non-complying resource consent to undertake winter earthworks. Considers large rain events that produce larger sediment pulses can occur at any time - and have become more erratic due to climate change.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule P.R23: Earthworks - restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year.
S165.041	12 Schedules	Schedule 30: Financial Contributions.	Oppose	Opposes the new framework relating to financial contributions in section 30. Concerned that financial contributions will hinder greenfield developments, impact housing availability and affordability, and PC1 does not assess these costs. Concerned mandatory blanket financial contribution will incentivise the development of large lots rather than intensification. Considering that acknowledging stormwater contamination is only practicable for a portion of the contaminant load shows the limitations of the proposed solution. Concerned stormwater contaminant treatment shows an overreliance on financial contribution without adequately exploring alternatives. as land use changes could improve water quality. Considers the proposed financial contribution to offset residual stormwater deterioration should not be the only option and is not the most equitable or efficient approach. Considers anticipating potential water quality deterioration, as outlined in Policy WH.P15 and P.P13, should prompt a more comprehensive exploration of solutions beyond relying solely on financial contributions. Considers the feasibility, timing and effectiveness of catchment-scale stormwater treatment systems unclear. Strongly opposes the application of a mandatory fee even if a development achieves greater than 85% reduction. Considers the proposed contribution is inconsistent with the purported purpose outlined by the GWRC.	Delete Schedule 30

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S165.042	13 Maps	Map 86: Unplanned greenfield areas - Porirua City Council.	Oppose	Opposes financial contributions to residual stormwater contaminants. Considers the framework fails to recognise that greenfield developments may result in improved contaminant discharges. Considers the imposition of financial contributions places the burden on developers and may hinder housing and urban growth and further exacerbating housing affordability and supply issues.	Delete map
S165.043	13 Maps	Map 87: Unplanned greenfield areas - Wellington City Council.	Oppose	Opposes financial contributions to residual stormwater contaminants. Considers the framework fails to recognise that greenfield developments may result in improved contaminant discharges. Considers the imposition of financial contributions places the burden on developers and may hinder housing and urban growth and further exacerbating housing affordability and supply issues.	Delete map
S165.044	13 Maps	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Oppose	Opposes financial contributions to residual stormwater contaminants. Considers the framework fails to recognise that greenfield developments may result in improved contaminant discharges. Considers the imposition of financial contributions places the burden on developers and may hinder housing and urban growth and further exacerbating housing affordability and supply issues.	Delete map
S165.045	13 Maps	Map 89: Unplanned greenfield areas - Hutt City Council.	Oppose	Opposes financial contributions to residual stormwater contaminants. Considers the framework fails to recognise that greenfield developments may result in improved contaminant discharges. Considers the imposition of financial contributions places the burden on developers and may hinder housing and urban growth and further exacerbating housing affordability and supply issues.	Delete map

S241 Pukerua Property Group Ltd

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S241.001	General comments	General comments - overall	Oppose	Opposes entirety of PC1; specifically Amendments to Chapters 5.2 and 5.3 - Discharges to land and water and Land use rules; and Amendments to Chapter 9 - Te Awarua-o-Porirua	Withdrawal of PC1
S241.002	General comments	General comments - economic cost/impact	Oppose	Considers PC1 has significant consequences for affordability of housing and land development in Wellington Region. Notes addition of a significant financial contribution for new residential units will have flow on housing affordability effects in the region and is inconsistent with Objective 2 and associated policies of NPS-UD. Concerned this has not been considered in the Section 32 report and completely ignores the affordability implications of the proposed changes, despite this being a key objective of the NPS-UD.	Withdrawal of PC1
S241.003	General comments	General comments - overall	Oppose	Notes haste in PC1 preparation with reference to the Clause 16 memo amending errors in rules. Highlights poor approach to planning policy.	Withdrawal of PC1
S241.004	General comments	General comments - consultation	Oppose	Notes the agreements of the government coalition to remove/replace legislation and suggest withdrawal of PC1 to allow a comprehensive review of PC1 provisions as they relate to national guidance. Because of those factors the submitter suggests the plan change is premature	Withdrawal of PC1
S241.005	General comments	General comments - stormwater management	Oppose	Concerns PC1 introduces increased uncertainty and cost to the provision of housing in Wellington region, directly affecting housing affordability. Considers requirement for financial contributions and risks cost introduced through additional consenting will have flow on effects to the cost of	Withdraw PC1. If PC1 not withdrawn, submitter seeks relief from combination of increased risk and cost through removal of financial contributions associated with new stormwater discharge provisions outlined in submission. Should relief not occur, submitter seeks new requirements

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				housing in the region and is inconsistent with Objective 2 and associated policies of NPS-UD.	for stormwater management and financial contributions be removed from new stormwater discharge provisions or amended to provide a more balanced approach to catchment management.
S241.006	General comments	General comments - definitions	Not Stated	Notes confusion in document as to what types of development the plan change relates to. Considers it should not relate to Rural Lifestyle or Rural development.	Withdraw PC1. If PC1 not withdrawn, there is a need to define "Greenfield Development" in the Plan Change to avoid confusion.
S241.007	General comments	General comments - overall	Not Stated	Considers errors and cost implications of plan change and the current state of flux with regard to national direction for freshwater management, purpose of the RMA would be better achieved by withdrawing PC1 to both await the changes in national direction from the new government and correct errors in the document that already have legal effect.	Withdraw PC1. Should PC1 not be withdrawn, submitter seeks amendment to stormwater discharge rules to reduce level of additional cost and risk introduced by the plan change.
S241.008	8 Whaitua Te Whanganui-a-Tara	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Amend	Considers using stormwater control to effectively manage or prevent land use is not consistent with integrated management principles contained in RMA.	Withdraw PC1. If PC1 not withdrawn, delete objectives and policies using stormwater controls to manage or prevent land use. If objective and policies are not deleted, they should be amended to remove avoidance principles and replaced with objectives and policies with same effect/guidance as remainder of PC1 before notification with perhaps some policy relief for activities that require consent under operative provisions (in force before PC1).
S241.009	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	Amend	Considers using stormwater control to effectively manage or prevent land use is not consistent with integrated management principles contained in RMA.	Withdraw PC1. If PC1 not withdrawn, delete objectives and policies using stormwater controls to manage or prevent land use. If objective and policies are not deleted, they should be amended to remove avoidance principles and replaced with objectives and policies with same effect/guidance as remainder of PC1 before notification with perhaps some policy relief for activities that require consent under operative provisions (in force before PC1).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S241.010	8 Whaitua Te Whanganui-a-Tara	Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy.	Amend	Considers using stormwater control to effectively manage or prevent land use is not consistent with integrated management principles contained in RMA.	Withdraw PC1. If PC1 not withdrawn, delete objectives and policies using stormwater controls to manage or prevent land use. If objective and policies are not deleted, they should be amended to remove avoidance principles and replaced with objectives and policies with same effect/guidance as remainder of PC1 before notification with perhaps some policy relief for activities that require consent under operative provisions (in force before PC1).
S241.011	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Considers using stormwater control to effectively manage or prevent land use is not consistent with integrated management principles contained in RMA.	Withdraw PC1. If PC1 not withdrawn, delete objectives and policies using stormwater controls to manage or prevent land use. If objective and policies are not deleted, they should be amended to remove avoidance principles and replaced with objectives and policies with same effect/guidance as remainder of PC1 before notification with perhaps some policy relief for activities that require consent under operative provisions (in force before PC1).
S241.012	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Amend	Considers using stormwater control to effectively manage or prevent land use is not consistent with integrated management principles contained in RMA.	Withdraw PC1. If PC1 not withdrawn, delete objectives and policies using stormwater controls to manage or prevent land use. If objective and policies are not deleted, they should be amended to remove avoidance principles and replaced with objectives and policies with same effect/guidance as remainder of PC1 before notification with perhaps some policy relief for activities that require consent under operative provisions (in force before PC1).
S241.013	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater	Amend	Considers using stormwater control to effectively manage or prevent land use is not consistent with integrated management principles contained in RMA.	Withdraw PC1. If PC1 not withdrawn, delete objectives and policies using stormwater controls to manage or prevent land use.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discharges from new unplanned greenfield development.			If objective and policies are not deleted, they should be amended to remove avoidance principles and replaced with objectives and policies with same effect/guidance as remainder of PC1 before notification with perhaps some policy relief for activities that require consent under operative provisions (in force before PC1).
S241.014	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Amend	Considers need for flexibility in policy documents that manage adverse effects of earthworks during certain periods. Considers Policy too blunt in its approach.	Withdraw PC1. If PC1 not withdrawn, delete policy or amend to provide for winter works subject to circumstantial criterion such as risk or likelihood of discharge; Topographical considerations/slope; Management of works; Distance to freshwater resources; Necessity of works; Economic considerations.
S241.015	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Oppose	Considers suite of rules and standards capture nearly all residential subdivision. Considers provisions will add significant cost to urban development not effectively assessed in Council's s32 analysis. Concerned costs imposed will lead to further housing unaffordability and a further escalation of house pricing.	Withdraw PC1. If PC1 not withdrawn, delete rule. If retained, amend to provide more realistic area calculation. Suggests where a subdivision creates a stormwater catchment in excess of 4ha then a controlled activity consent may be required but this should be the only standard that the rule framework is subject to.
S241.016	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Oppose	Considers suite of rules and standards capture nearly all residential subdivision. Considers provisions will add significant cost to urban development not effectively assessed in Council's s32 analysis. Concerned costs imposed will lead to further housing unaffordability and a further escalation of house pricing.	Withdraw PC1. If PC1 not withdrawn, delete rule. If retained, amend to provide more realistic area calculation. Suggests where a subdivision creates a stormwater catchment in excess of 4ha then a controlled activity consent may be required but this should be the only standard that the rule framework is subject to.
S241.017	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new	Oppose	Considers suite of rules and standards capture nearly all residential subdivision. Considers provisions will add significant cost to	Withdraw PC1. If PC1 not withdrawn, delete rule. If retained, amend related rules to provide more realistic area calculation. Suggests where a subdivision creates a

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and redeveloped impervious surfaces - discretionary activity.		urban development not effectively assessed in Council's s32 analysis. Concerns costs imposed will lead to further housing unaffordability and a further escalation of house pricing.	stormwater catchment in excess of 4ha then a controlled activity consent may be required but this should be the only standard that the rule framework is subject to.
S241.018	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Oppose	Considers suite of rules and standards capture nearly all residential subdivision. Considers provisions will add significant cost to urban development not effectively assessed in Council's s32 analysis. Concerned costs imposed will lead to further housing unaffordability and a further escalation of house pricing.	Withdraw PC1. If PC1 not withdrawn, delete rule. If retained, amend related rules to provide more realistic area calculation. Suggests where a subdivision creates a stormwater catchment in excess of 4ha then a controlled activity consent may be required but this should be the only standard that the rule framework is subject to.
S241.019	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Considers it not appropriate to use stormwater rules to prohibit consideration of certain land uses. Notes land use control as being a territorial function only. Considers prohibited activities a blunt tool that does not provide flexibility to changes in land use that may result in environmental benefits.	Withdraw PC1. If PC1 not withdrawn, remove prohibited activities rules for stormwater discharges
S241.020	9 Te Awarua-o-Porirua Whaitua	Objective P.O1: The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands,	Amend	Considers using stormwater control to effectively manage or prevent land use is not consistent with integrated management principles contained in RMA.	Withdraw PC1. If PC1 not withdrawn, delete objectives and policies using stormwater controls to manage or prevent land use. If objective and policies are not deleted, they should be amended to remove avoidance principles and replaced with objectives and policies with same effect/guidance as remainder of PC1 before notification with perhaps some policy relief for activities that require consent under operative provisions (in force before PC1).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100.			
S241.021	9 Te Awarua-o-Porirua Whaitua	Objective P.O2: Te Awarua-o-Porirua's groundwater, rivers, lakes and natural wetlands, and their margins are on a trajectory of measurable improvement towards wai ora.	Amend	Considers using stormwater control to effectively manage or prevent land use is not consistent with integrated management principles contained in RMA.	Withdraw PC1. If PC1 not withdrawn, delete objectives and policies using stormwater controls to manage or prevent land use. If objective and policies are not deleted, they should be amended to remove avoidance principles and replaced with objectives and policies with same effect/guidance as remainder of PC1 before notification with perhaps some policy relief for activities that require consent under operative provisions (in force before PC1).
S241.022	9 Te Awarua-o-Porirua Whaitua	Objective P.O3: The health and wellbeing of coastal water	Amend	Considers using stormwater control to effectively manage or prevent land use is not consistent with integrated management principles contained in RMA.	Withdraw PC1. If PC1 not withdrawn, delete objectives and policies using stormwater controls to manage or prevent land use. If objective and policies are not deleted, they should be amended to remove avoidance principles and replaced with

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		quality, ecosystems and habitats in Pāuatahanui Inlet, Onepoto Arm and the open coastal areas of Te Awarua-o-Porirua is maintained or improved to achieve the coastal water objectives set out in Table 9.1.			objectives and policies with same effect/guidance as remainder of PC1 before notification with perhaps some policy relief for activities that require consent under operative provisions (in force before PC1).
S241.023	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	Considers using stormwater control to effectively manage or prevent land use is not consistent with integrated management principles contained in RMA.	Withdraw PC1. If PC1 not withdrawn, delete objectives and policies using stormwater controls to manage or prevent land use. If objective and policies are not deleted, they should be amended to remove avoidance principles and replaced with objectives and policies with same effect/guidance as remainder of PC1 before notification with perhaps some policy relief for activities that require consent under operative provisions (in force before PC1).
S241.024	9 Te Awarua-	Policy P.P4: Contamina	Amend	Considers using stormwater control to effectively manage or prevent land use is not consistent with	Withdraw PC1. If PC1 not withdrawn, delete objectives and policies using stormwater controls to manage or prevent land use.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	nt load reductions .		integrated management principles contained in RMA.	If objective and policies are not deleted, they should be amended to remove avoidance principles and replaced with objectives and policies with same effect/guidance as remainder of PC1 before notification with perhaps some policy relief for activities that require consent under operative provisions (in force before PC1).
S241.025	9 Te Awarua-o-Porirua Whaitua	Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Amend	Considers using stormwater control to effectively manage or prevent land use is not consistent with integrated management principles contained in RMA.	Withdraw PC1. If PC1 not withdrawn, delete objectives and policies using stormwater controls to manage or prevent land use. If objective and policies are not deleted, they should be amended to remove avoidance principles and replaced with objectives and policies with same effect/guidance as remainder of PC1 before notification with perhaps some policy relief for activities that require consent under operative provisions (in force before PC1).
S241.026	9 Te Awarua-o-Porirua Whaitua	Policy P.P10: Managing adverse effects of stormwater discharges .	Amend	Considers using stormwater control to effectively manage or prevent land use is not consistent with integrated management principles contained in RMA.	Withdraw PC1. If PC1 not withdrawn, delete objectives and policies using stormwater controls to manage or prevent land use. If objective and policies are not deleted, they should be amended to remove avoidance principles and replaced with objectives and policies with same effect/guidance as remainder of PC1 before notification with perhaps some policy relief for activities that require consent under operative provisions (in force before PC1).
S241.027	9 Te Awarua-o-Porirua Whaitua	Policy P.P12: Managing stormwater network discharges through a Stormwater	Amend	Considers using stormwater control to effectively manage or prevent land use is not consistent with integrated management principles contained in RMA.	Withdraw PC1. If PC1 not withdrawn, delete objectives and policies using stormwater controls to manage or prevent land use. If objective and policies are not deleted, they should be amended to remove avoidance principles and replaced with objectives and policies with same effect/guidance as remainder of PC1 before notification with perhaps some

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Management Strategy.			policy relief for activities that require consent under operative provisions (in force before PC1).
S241.028	9 Te Awarua-o-Porirua Whaitua	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Considers using stormwater control to effectively manage or prevent land use is not consistent with integrated management principles contained in RMA.	Withdraw PC1. If PC1 not withdrawn, delete objectives and policies using stormwater controls to manage or prevent land use. If objective and policies are not deleted, they should be amended to remove avoidance principles and replaced with objectives and policies with same effect/guidance as remainder of PC1 before notification with perhaps some policy relief for activities that require consent under operative provisions (in force before PC1).
S241.029	9 Te Awarua-o-Porirua Whaitua	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Amend	Considers using stormwater control to effectively manage or prevent land use is not consistent with integrated management principles contained in RMA.	Withdraw PC1. If PC1 not withdrawn, delete objectives and policies using stormwater controls to manage or prevent land use. If objective and policies are not deleted, they should be amended to remove avoidance principles and replaced with objectives and policies with same effect/guidance as remainder of PC1 before notification with perhaps some policy relief for activities that require consent under operative provisions (in force before PC1).
S241.030	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Amend	Considers using stormwater control to effectively manage or prevent land use is not consistent with integrated management principles contained in RMA.	Withdraw PC1. If PC1 not withdrawn, delete objectives and policies using stormwater controls to manage or prevent land use. If objective and policies are not deleted, they should be amended to remove avoidance principles and replaced with objectives and policies with same effect/guidance as remainder of PC1 before notification with perhaps some policy relief for activities that require consent under operative provisions (in force before PC1).
S241.031	9 Te Awarua-	Rule P.R5: Stormwater from new	Oppose	Considers suite of rules and standards capture nearly all residential subdivision.	Withdraw PC1. If PC1 not withdrawn, delete rule. If retained, amend to provide more realistic area calculation.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	and redeveloped impervious surfaces - permitted activity.		Considers provisions will add significant cost to urban development not effectively assessed in Council's s32 analysis. Concerned costs imposed will lead to further housing unaffordability and a further escalation of house pricing.	Suggests where a subdivision creates a stormwater catchment in excess of 4ha then a controlled activity consent may be required but this should be the only standard that the rule framework is subject to.
S241.032	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Oppose	Considers suite of rules and standards capture nearly all residential subdivision. Considers provisions will add significant cost to urban development not effectively assessed in Council's s32 analysis. Concerns costs imposed will lead to further housing unaffordability and a further escalation of house pricing.	Withdraw PC1. If PC1 not withdrawn, delete rule. If retained, amend to provide more realistic area calculation. Suggests where a subdivision creates a stormwater catchment in excess of 4ha then a controlled activity consent may be required but this should be the only standard that the rule framework is subject to.
S241.033	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas- controlled activity.	Oppose	Considers suite of rules and standards capture nearly all residential subdivision. Considers provisions will add significant cost to urban development not effectively assessed in Council's s32 analysis. Concerned costs imposed will lead to further housing unaffordability and a further escalation of house pricing.	Withdraw PC1. If PC1 not withdrawn, delete rule. If retained, amend to provide more realistic area calculation. Suggests where a subdivision creates a stormwater catchment in excess of 4ha then a controlled activity consent may be required but this should be the only standard that the rule framework is subject to.
S241.034	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious	Oppose	Considers suite of rules and standards capture nearly all residential subdivision. Considers provisions will add significant cost to urban development not effectively assessed in Council's s32 analysis. Concerned costs imposed will lead to further	Withdraw PC1. If PC1 not withdrawn, delete rule. If retained, amend related rules to provide more realistic area calculation. Suggests where a subdivision creates a stormwater catchment in excess of 4ha then a controlled activity consent may be required but this should be the only standard that the rule framework is subject to.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		surfaces-discretionary activity.		housing unaffordability and a further escalation of house pricing.	
S241.035	9 Te Awarua-o-Porirua Whaitua	Rule P.R11: All other stormwater discharges - non-complying activity.	Oppose	Considers suite of rules and standards capture nearly all residential subdivision. Considers provisions will add significant cost to urban development not effectively assessed in Council's s32 analysis. Concerned costs imposed will lead to further housing unaffordability and a further escalation of house pricing.	Withdraw PC1. If PC1 not withdrawn, delete rule. If retained, amend related rules to provide more realistic area calculation. Suggests where a subdivision creates a stormwater catchment in excess of 4ha then a controlled activity consent may be required but this should be the only standard that the rule framework is subject to.
S241.036	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Oppose	Considers it not appropriate to use stormwater rules to prohibit consideration of certain land uses. Notes land use control as being a territorial function only. Considers prohibited activities a blunt tool that does not provide flexibility to changes in land use that may result in environmental benefits.	Remove prohibited activities rules for stormwater discharges
S241.037	12 Schedules	Schedule 27: Freshwater Action Plan requirements.	Oppose	Considers information required in schedule is not commensurate to scale of individual developments. Considers plans should relate to functional engineering considerations and NZS4404 should be used as the basis of the plan.	Remove or simplify schedule
S241.038	12 Schedules	Schedule 30: Financial Contributions.	Oppose	Concerns it is not specific or clear what the financial contributions will be used or taken for.	Remove need to provide financial contributions for stormwater discharges.

S217 R P Mansell; A J Mansell, & M R Mansell

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S217.001	General comments	General comments - overall	~~Not Stated~~ Oppose	Considers the use of the prohibited activity status for unplanned greenfield development is inappropriate, as the effects are not specified for any particular area. Considers requiring two plan changes (district and regional) is a misuse of the prohibited activity category, which is intended to be used where effects are easily identifiable and discrete. Notes the effects of the prohibited activity are not specified for any particular area, and the extent of the area does not warrant a blanket approach. Considers this proposed approach is onerous, costly and will not achieve implementation of the NPS-UD. Considers 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. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	Policies associated with unplanned greenfield developments to be amended to provide for the "avoidance **or minimising"** of adverse effects This relates to policies WH.P5 & P.P5, WH.P6 & P.P6, WH.P16 & P.P15. Stormwater discharge activities associated with unplanned greenfield development which have prohibited activity status to either be deleted or have their activity statuses amended. This relates to policies WH.P2 & P.P2; Rules WH.R13 & P.R12.
S217.002	General comments	General comments - maps	Not Stated	Concerned with the quality and detail of the PC1 maps.	Improve quality/resolution of PC1 maps.
S217.003	2 Interpretation	Unplanned greenfield development	~~Amend~~ Oppose	Concerned development in areas identified as unplanned greenfield development require a plan change process to enable the development. Considers the dual plan change process required under PC1 to change greenfield development from unplanned to planned should not be used as an alternative to the resource consenting process. Concerned the private plan change process will not be effective. Opposes only planned greenfield development being provided for in PC1 and unplanned greenfield development requiring a dual plan change. Considers that the prohibition of	All greenfield development to be considered on their merits, and rely on provisions in the NRP and district plan zoning/provisions to manage adverse effects of greenfield development. Delete all provisions referencing "unplanned greenfield development". Delete definition for "unplanned greenfield development"

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				activities is contrary to the NPS-UD. Considers insufficient evidence is provided in the s32 report.	
S217.004	8 Whaitua Te Whanganui-a-Tara	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	~~Amend~~ Oppose	Notes Objectives WH.O6 and P.O5 intend to 'protect' groundwater dependent ecosystems and ecosystems in connected surface water bodies, and 'avoid' aquifer consolidation (Objective WH.O6). Opposes these approaches as they lead to restrictive and unnecessary restrictions in policies and rules to appropriately implement the objective. Considers an effects management approach is more appropriate and provides a balanced response.	[...] (b) ~~protect~~ **ensure that** groundwater dependent ecosystems **are maintained or improved where degraded** (c) ~~protect~~ **ensure that** ecosystems in connected surface water bodies **are maintained or improved where degraded,** and [...] (f) avoid **or minimise** aquifer consolidation [...]
S217.005	8 Whaitua Te Whanganui-a-Tara	Policy WH.P1: Improvement of aquatic ecosystem health.	Amend	Considers the policy does not accurately reflect the objectives on aquatic ecosystem health. Considers that the objectives provide more flexibility than only an "improve" approach.	Improvement of aquatic ecosystem health Aquatic ecosystem health will be **maintained or** improved **where relevant target attribute state is not met** by: (a) progressively reducing the load or concentration of contaminants, particularly sediment, nutrients, pathogens and metals, entering water **where relevant target attribute state is not met,** and (b) **maintaining or** restoring habitats **where relevant target attribute state is not met,** and (c) **maintaining** or enhancing the natural flow regime of rivers and managing water flows and levels **where relevant target attribute state is not met,** including where there is interaction of flows between surface water and groundwater, and (d) co-ordinating and prioritising work programmes in catchments that require changes to land use activities that impact on water.
S217.006	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	~~Amend~~ Oppose	Considers the proposed shut down period for winter earthworks is onerous and unnecessary in light of the other provisions.	Delete winter shut down requirements. Retain existing effects management approach for sediment discharges from earthworks.
S217.007	8 Whaitua Te	Rule WH.R5:	Amend	Generally supports the proposed activity status; however considers the exclusion of "unplanned	Retain permitted activity status.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	Stormwater from new and redeveloped impervious surfaces - permitted activity.		greenfield development" unnecessary and inappropriate, as the rule is already focussed on new or redevelopment of existing impervious surfaces. Considers that the proposed impervious area limit is too restrictive and does not account for subdivision of large properties into smaller lots, or where impervious surfaces are historical.	Amend clause (a) as follows: (a) the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m2 **on an existing lot or future subdivided lot over a 12 month period** (baseline property existing impervious area as at 30 October 2023) and... Delete 'unplanned greenfield development' from rule WH.R5
S217.008	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Not Stated	Supports the proposed activity status; considers the proposed impervious area limit is too restrictive and does not account for subdivision of large properties into smaller lots, or where impervious surfaces are historical.	Retain controlled activity status. Amend clause (a) as follows: (a) the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m2 **on an existing lot or future subdivided lot over a 12 month period** (baseline property existing impervious area as at 30 October 2023) and... Delete 'unplanned greenfield development' from rule WH.R6
S217.009	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Amend	Supports the proposed activity status, however opposes the reference to Rule WH.R13.	Retain discretionary activity status. Delete reference to Rule WH.R13.
S217.010	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-	Amend	Generally supports the effects management approach relating to contaminants in stormwater discharges, however considers that discretionary activity status is more appropriate than non-complying activity status.	Retain existing effects management approach for contaminants in stormwater discharges. Amend activity status from non-complying to discretionary.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		complying activity.			
S217.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	~~Amend~~ Oppose	Considers the use of the prohibited activity status for unplanned greenfield development is inappropriate, as the effects are not specified for any particular area. Considers this proposed approach is onerous, costly and will not achieve implementation of the NPS-UD. Considers that 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. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	Delete prohibited activity status for stormwater discharges from unplanned greenfield development. Delete 'unplanned greenfield development' from rule WH.13
S217.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	~~Amend~~ Oppose	Considers the proposed shut down period for winter earthworks is onerous and unnecessary in light of the other provisions.	Retain existing effects management approach for sediment discharges from earthworks. Delete winter shut down requirements.
S217.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Amend	Generally supports the effects management approach, however considers that discretionary activity status is more appropriate than non-complying activity status.	Amend from non-complying activity to discretionary activity. Retain existing effects management approach for sediment discharges from earthworks.
S217.014	9 Te Awarua-o-Porirua Whaitua	Objective P.O5: Groundwater flows and levels, and water quality, are maintained.	~~Amend~~ Oppose	Concerned the "protect" approach will lead to unnecessarily restrictive policies and rules. Considers that an effects management approach is more appropriate.	Groundwater flows and levels, and water quality, are maintained at levels that ~~protect~~ **ensure that:** (a) groundwater dependent ecosystems **are maintained or improved where degraded,** and (b) the values of connected surface water bodies in places where groundwater flows to surface water **are maintained or improved where degraded.**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S217.015	9 Te Awarua-o-Porirua Whaitua	Policy P.P1: Improvement of aquatic ecosystem health.	Amend	Considers the policy does not accurately reflect the objectives on aquatic ecosystem health. Considers that the objectives provide more flexibility than only an "improve" approach.	Improvement of aquatic ecosystem health Aquatic ecosystem health will be **maintained or** improved **where relevant target attribute state is not met** by: (a) progressively reducing the load or concentration of contaminants, particularly sediment, nutrients, pathogens and metals, entering water **where relevant target attribute state is not met,** and (b) **maintaining or** restoring habitats **where relevant target attribute state is not met,** and (c) **maintaining** or enhancing the natural flow regime of rivers and managing water flows and levels **where relevant target attribute state is not met,** including where there is interaction of flows between surface water and groundwater, and (d) co-ordinating and prioritising work programmes in catchments that require changes to land use activities that impact on water.
S217.016	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Supports the proposed activity status; however considers the exclusion of "unplanned greenfield development" unnecessary and inappropriate, as the rule is already focussed on new or redevelopment of existing impervious surfaces. Considers that the proposed impervious area limit is too restrictive and does not account for subdivision of large properties into smaller lots, or where impervious surfaces are historical.	Retain permitted activity status. Amend clause (a) as follows: (a) the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m2 **on an existing lot or future subdivided lot over a 12 month period** (baseline property existing impervious area as at 30 October 2023) and... Delete 'unplanned greenfield development' from rule P.R5
S217.017	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Supports the proposed activity status; considers that the proposed impervious area limit is too restrictive and does not account for subdivision of large properties, into smaller lots or where impervious surfaces are historical.	Retain controlled activity status. Amend clause (a) as follows: (a) the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m2 **on an existing lot or future subdivided lot over a 12 month period** (baseline property existing impervious area as at 30 October 2023) and... Delete 'unplanned greenfield development' from rule P.R6

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S217.018	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Amend	Supports the proposed activity status, however opposes the reference to Rule P.R12.	Retain discretionary activity status. Delete reference to Rule P.R12.
S217.019	9 Te Awarua-o-Porirua Whaitua	Rule P.R11: All other stormwater discharges - non-complying activity.	Amend	Generally supports the effects management approach, however considers that discretionary activity status is more appropriate than non-complying activity status.	Retain existing effects management approach for contaminants in stormwater discharges. Amend activity status from non-complying to discretionary.
S217.020	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	~~Amend~~ Oppose	Considers the use of the prohibited activity status for unplanned greenfield development is inappropriate, as the effects are not specified for any particular area. Considers this proposed approach is onerous, costly and will not achieve implementation of the NPS-UD. Considers that 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. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	Delete prohibited activity status for stormwater discharges from unplanned greenfield development. Delete 'unplanned greenfield development' from rule P.R12.
S217.021	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted	~~Amend~~ Oppose	Considers the proposed shut down period for winter earthworks is onerous and unnecessary in light of the other provisions.	Retain existing effects management approach for sediment discharges from earthworks. Delete winter shut down requirements.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discretionary activity.			
S217.022	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks - non-complying activity.	Amend	Generally supports the effects management approach, however considers that discretionary activity status is more appropriate than non-complying activity status.	Amend from non-complying activity to discretionary activity. Retain existing effects management approach for sediment discharges from earthworks.
S217.023	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	~~Amend~~ Oppose	Considers the proposed shut down period for winter earthworks is onerous and unnecessary in light of the other provisions.	Delete winter shut down requirements. Retain existing effects management approach for sediment discharges from earthworks.
S217.024	13 Maps	Map 86: Unplanned greenfield areas - Porirua City Council.	Amend	Considers prohibiting unplanned greenfield development and requiring two plan changes (district and regional) is a misuse of the prohibited activity category, which is intended to be used where effects are easily identifiable and discrete. Notes the effects of the prohibited activity are not specified for any particular area, and the extent of the area does not warrant a blanket approach. Considers that 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. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	All greenfield development to be considered on their merits, and rely on provisions in the NRP and district plan zoning/provisions to manage adverse effects of greenfield development. Delete "unplanned greenfield areas" notation
S217.025	13 Maps	Map 87: Unplanned greenfield areas - Wellington City Council.	Amend	Considers 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. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	Delete "unplanned greenfield areas" notation

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S217.026	13 Maps	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Amend	Considers 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. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	Delete "unplanned greenfield areas" notation
S217.027	13 Maps	Map 89: Unplanned greenfield areas - Hutt City Council.	Amend	Considers 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. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	Delete "unplanned greenfield areas" notation
S217.028	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	~~Amend~~ Oppose	Considers that the use of the prohibited activity status for unplanned greenfield development is inappropriate, as the effects are not specified for any particular area. Considers this proposed approach is onerous, costly and will not achieve implementation of the NPS-UD. Considers that 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. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	~~Delete policy~~ Delete reference to prohibiting 'unplanned greenfield development' within Policy (i.e. delete clause (a)). Delete or recategorize the prohibited activity status for stormwater discharge activities associated with 'unplanned greenfield development'
S217.029	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	~~Amend~~ Oppose	Considers the use of the prohibited activity status for unplanned greenfield development is inappropriate, as the effects are not specified for any particular area. Considers this proposed approach is onerous, costly and will not achieve implementation of the NPS-UD. Considers that 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. Seeks for provisions which avoid or prohibit activities	Delete policy

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				associated with unplanned greenfield development to be deleted.	
S217.030	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	~~Amend~~ Oppose	Considers the use of the prohibited activity status for unplanned greenfield development is inappropriate, as the effects are not specified for any particular area. Considers this proposed approach is onerous, costly and will not achieve implementation of the NPS-UD. Considers that 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. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	~~Delete policy~~ Delete reference to prohibiting 'unplanned greenfield development' within Policy (i.e. delete clause (a)). Delete or recategorize the prohibited activity status for stormwater discharge activities associated with 'unplanned greenfield development'
S217.031	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	~~Amend~~ Oppose	Considers the use of the prohibited activity status for unplanned greenfield development is inappropriate, as the effects are not specified for any particular area. Considers this proposed approach is onerous, costly and will not achieve implementation of the NPS-UD. Considers that 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. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	Delete policy
S217.032	9 Te Awarua-o-Porirua Whaitua	P.P5: Localised adverse effects of point source discharges.	Oppose	Considers the use of the prohibited activity status for unplanned greenfield development is inappropriate, as the effects are not specified for any particular area. Considers requiring two plan changes (district and regional) is a misuse of the prohibited activity category, which is intended to be used where effects are easily identifiable and discrete. Notes the effects of the prohibited activity are not specified for any particular area, and the extent of the area does not warrant a blanket	Delete reference to 'unplanned greenfield development' within Policy. Policies associated with unplanned greenfield developments to be amended to provide for the "avoidance **or minimising"** of adverse effects

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				approach. Considers this proposed approach is onerous, costly and will not achieve implementation of the NPS-UD. Considers 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. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	
S217.033	9 Te Awarua-o-Porirua Whaitua	P.P6: Point source discharges	Oppose	Considers the use of the prohibited activity status for unplanned greenfield development is inappropriate, as the effects are not specified for any particular area. Considers requiring two plan changes (district and regional) is a misuse of the prohibited activity category, which is intended to be used where effects are easily identifiable and discrete. Notes the effects of the prohibited activity are not specified for any particular area, and the extent of the area does not warrant a blanket approach. Considers this proposed approach is onerous, costly and will not achieve implementation of the NPS-UD. Considers 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. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	Delete reference to 'unplanned greenfield development' within Policy. Policies associated with unplanned greenfield developments to be amended to provide for the "avoidance or **minimising**" of adverse effects
S217.034	9 Te Awarua-o-Porirua Whaitua	P.R1: Point source discharges of specific contaminants – prohibited activity.	Oppose	Considers the use of the prohibited activity status for unplanned greenfield development is inappropriate, as the effects are not specified for any particular area. Considers requiring two plan changes (district and regional) is a misuse of the prohibited activity category, which is intended to be used where effects are easily identifiable and discrete. Notes the effects of the prohibited activity are not specified for any particular area, and the extent of the area does not warrant a blanket	Not stated.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				approach. Considers this proposed approach is onerous, costly and will not achieve implementation of the NPS-UD. Considers 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. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	

S085 Rangitāne o Wairarapa

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S85.001	5.4 Beds of lakes and rivers	5.4.8 Damming and diverting water	Oppose	Considers long term consents for permanent diversion allows for review of the consent and effects, including consultation with mana whenua and other parties to ensure the diversion remains appropriate.	Delete proposed rule.
S85.002	6 Other methods	6.16 Freshwater Action Plan programme	Amend	Supports partnership directives for the creation of freshwater action plans. Suggests there is a role for mana whenua to measure and understand the effectiveness of actual outcomes in either pūtaiao or mātauranga Māori (which only Tangata whenua can do).	Amend to include "in partnership with tangata whenua" in the statement around monitoring the effectiveness of the Freshwater Action Plans.
S85.003	5.4 Beds of lakes and rivers	5.4.4 Uses of beds of lakes and rivers general conditions.	Amend	Supports proposed changes to beds of lakes and rivers rules to improve clarity. Concerned sites of significance to mana whenua not identified in Schedule C will not be protected.	Amend to include requirement to consult with tangata whenua for activities in the beds of lakes and rivers.
S85.004	5.5 Water allocation rules	Rule R128: New structures - permitted activity.	Amend	Supports proposed changes to beds of lakes and rivers rules to improve clarity. Concerned sites of significance to mana whenua not identified in Schedule C will not be protected.	Amend to include requirement to consult with tangata whenua for activities in the beds of lakes and rivers.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S85.005	5.5 Water allocation rules	Rule R132: Minor sand and gravel extraction - permitted activity.	Amend	Supports proposed changes to beds of lakes and rivers rules to improve clarity. Concerned sites of significance to mana whenua not identified in Schedule C will not be protected.	Amend to include requirement to consult with tangata whenua for activities in the beds of lakes and rivers.
S85.006	5.5 Water allocation rules	Rule R133: Gravel extraction for flood protection purposes or erosion mitigation inside sites of significance - discretionary activity.	Amend	Supports proposed changes to beds of lakes and rivers rules to improve clarity. Concerned sites of significance to mana whenua not identified in Schedule C will not be protected.	Amend to include requirement to consult with tangata whenua for activities in the beds of lakes and rivers.
S85.007	5.5 Water allocation rules	Rule R133: Gravel extraction for flood protection purposes or erosion mitigation inside sites of significance - discretionary activity.	Amend	Supports proposed changes to beds of lakes and rivers rules to improve clarity. Concerned that sites of significance to mana whenua not identified in Schedule C will not be protected.	Amend to include requirement to consult with tangata whenua for activities in the beds of lakes and rivers.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S85.008	5.4 Beds of lakes and rivers	Rule R145: All other uses of river and lake beds - discretionary activity.	Amend	Supports proposed changes to beds of lakes and rivers rules to improve clarity. Concerned sites of significance to mana whenua not identified in Schedule C will not be protected.	Amend to include requirement to consult with tangata whenua for activities in the beds of lakes and rivers.

S185 Ray Beentjes

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S185.001	General comments	General comments - water bodies	Not Stated	Values the water quality values of the following areas for contact recreation and ecosystem health: i. Te Awakairangi / the Hutt River ii. Whakatikei River iii. Te Whanganui a Tara / Wellington Harbour iv. Titahi Bay v. Lyall Bay Considers the natural form and character of these waterbodies is an important part of their value. Natural form and character creates rapids and other features of these sections of river that make them valuable for kayaking. Considers Te Awakairangi / the Hutt Gorge is an outstanding run for whitewater kayaking, which traverses what they consider to be an outstanding landscape with outstanding amenity values. Notes the importance of the natural and wildlife values of these areas.	Requests the outstanding value of this section [Te Awakairangi / the Hutt Gorge] of river is recognised in the plan.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S185.002	General comments	General comments - fresh water	Not Stated	Concerned about increased amounts of sediment coming from the Pakuratahi River when flows increase and potential e.coli and pathogen loads in the water. Observes algae in summer months when flows are low resulting in issues with recreation and amenity as well as human health when making contact with water. Concerns river engineering such as railway iron degrades water quality and creates potential hazards for river users when slash and logs get caught on structures	Not stated
S185.003	General comments	General comments - overall	Support	Supports PC1 and the initiatives to introduce to improve water quality in the catchment.	Requests that GWRC initiatives are carried through to the operative plan, particularly where they protect and restore ecosystem health, contact recreation values, natural form and character, and amenity.
S185.004	General comments	General comments - water quality improvements	Support	Supports targets in the water quality target tables.	Requests as much work as possible is done through environmental limits to achieve water quality targets.
S185.005	General comments	General comments - fresh water	Support	Supports the concept of Te Mana o te Wai and the hierarchy of obligations.	Prioritise ecosystem health and contact recreation prioritised.
S185.006	General comments	General comments - water quality improvements	Not Stated	Key concerns are water quality (particularly e. coli, sediment, algal growth/periphyton, and ecosystem health); amenity; contact recreation; and natural form and character.	Seeks the following: Recognition in the plan of the outstanding kayaking / packrafting / rafting values in the Whaitua are recognised in the plan, particularly for the Hutt Gorge (which has outstanding kayaking, amenity, and landscape values). More work by GWRC to monitor and preserve natural character, and to strengthen objectives, policies, and rules which allow the river to function more naturally, particularly in its reaches influenced by flood protection.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					Targets for natural character that are similar to the sorts of targets set for water quality and seeks objectives and policies that support these. More work to enhance water quality in the coastal environment, for use of 'flat water' environments to learn and train without worrying about compromising health if contact is made with the water. Retain coastal water quality indicators/targets.

S047 Richard Swan

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S47.001	General comments	General comments - overall	Not Stated	Supports full submissions from National New Zealand Farm Forestry Associated and Wellington branch New Zealand Farm Forestry Association.	Not stated
S47.002	General comments	General comments - economic cost/impact	Not Stated	Concerned the economic impacts of proposed rules and requirements in PC1 would render forest operation uneconomic.	Not stated
S47.003	General comments	General comments - overall	Not Stated	Considers proposed rules governing forestry in PC1 would render land incapable of reasonable use. Challenges these rules in accordance with s85 RMA.	Not stated

S273 Robert Pavis-Hall, Gaynor Rowswell, Katie Norman, Megan Norman

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S273.001	General comments	General comments - consultation	Oppose	Concerned about the lack of communication and consultation around PC1.	Withdraw PC1.
S273.002	General comments	General comments - current legislation	Oppose	Suggests that it might be prudent to delay PC1 until the new govt makes a decision on legislation/policy direction.	Withdraw PC1 until the new govt has confirmed new legislation.
S273.003	General comments	General comments - rural	Oppose	Queries whether animals that are not cattle, farmed deer and farmed pigs are exempt from PC1. Questions how wild deer, pigs and goats will be managed.	Confirm rules related to other animals (outside of cattle, farmed deer and farmed pigs). Control pest species being pushed from GWRC land to private land property.
S273.004	General comments	General comments - rural	Oppose	Holds concerns surrounding the lack of evidence that waterway contamination comes from farming activities and that it falls to landowners to test and prove the opposite. Suggests urbanised areas and major roads should be looked at first	Attribute contamination levels to urbanised areas rather than farming activities and act accordingly.
S273.005	General comments	General comments - water bodies	Oppose	Concerned about the open-ended definition for a minimum and lack of guidance on how/where to measure.	Withdraw all measures against the Upper Hutt 'farming' community, and heed its own report.
S273.006	General comments	General comments - overall	Oppose	Considers the consultation period too short due to lack of prior knowledge, the size and the technicality of the report. Notes that consultation period also too close to Christmas when people are winding down for the year.	Withdraw PC1 to allow proper consultation when new government legislation is clear.
S273.007	General comments	General comments – plantation forestry	Oppose	Notes that the largest area of Highest Risk Plantation is Regional Park and questions whether GWRC will fence off all the areas prone to erosion in the regional park and wonders how GWRC propose to pay for it.	Withdraw PC1 until new government has decided fate of PC1 .

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S273.008	General comments	General comments - overall	Oppose	Reserves the right to add to this submission as considers consultation period too short.	Not stated
S273.009	6 Other methods	6.17 Small farm property registration	Oppose	Does not consider small farms an accurate description of the majority of 4 ha blocks that may have little or no pasture. Feel GWRC have taken the concept of farms to the extreme.	Delete the requirement for "Farms" of 50ha or less to register with GWRC.

S025 Robin Chesterfield

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S25.001	General comments	General comments - overall	Not Stated	Supports the National New Zealand Farm Forestry Association and the Wellington branch of the New Zealand Farm Forestry Association Submissions	Not stated
S25.002	General comments	General comments - overall	Not Stated	Concerned rules governing forestry in PC1 would render interest in land incapable of reasonable use	Not stated
S25.003	General comments	General comments - economic cost/impact	Not Stated	Believes costs and restrictions of PC1 would make their forestry operation uneconomic and limit future income	Not stated

S220 Rosco Ice Cream Ltd

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S220.001	General comments	General comments - definitions	Not Stated	Requests a definition of "greenfield development" is included. Presumably a greenfield development is the development of an existing grassed property (mapped as 'planned/existing urban area') with no	Include a definition of "greenfield development"

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				existing impervious surfaces, where the development also includes provision of new roads to be vested and new sewage and stormwater infrastructure to be vested.	
S220.002	2 Interpretation	Earthworks	Oppose	Opposes the definition of "earthworks" that relates to the Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua as the definition removes all reasonable exceptions from the current definition and only excludes gardening, cultivation and post holes.	Retain the original definition of earthworks for all whaitua.
S220.003	2 Interpretation	High risk industrial or trade premise	Amend	Notes the key points of this definition are that the activity involves contaminants / hazardous substances and that these are exposed to rain. Conditionally supports the definition as the definition requires exposure to the weather.	Rosco seeks the addition of an exception to be added to the end of the definition - as follows:**However, where these activities are contained within buildings, full covered or fully bunded to prevent discharge of stormwater from the hazardous substance / contaminants, they are excluded from the definition.**
S220.004	2 Interpretation	Hydrological control	Amend	Opposes the definition as the existing use rights that a site should enjoy for it's current stormwater discharge are lost due to the definition requiring the volume of stormwater discharged from a developed infill / brownfield site to be reduced as far as practicable so that the discharge is not more than if the site was an undeveloped grassed site. Notes that as various permitted activity rules refer to a requirement to utilise hydrological controls as a permitted standard, the use of the term as far as practicable suggests that a discretion has to be exercised in order to determine if an activity is permitted or not. Considers such discretion creates uncertainty for applicants and therefore is not appropriate for a permitted standard. Questions who would determine whether a proposal achieves a suitable reduction of stormwater runoff that is as far as practicable and what criteria would be taken into consideration when determining if a proposal for hydrological control is appropriate.	Amend definition as follows: The management of a range of stormwater flows ~~and volumes,~~ and the frequency and timing of those flows ~~and volumes,~~ from a site or sites into rivers, lakes, wetlands, springs, riparian margins, and other receiving environments that reduces the existing stormwater flows by 50% ~~in a way that replicates natural processes~~ for the purpose of reducing bank erosion, slumping, or scour, to protect freshwater ecosystem health and well-being.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S220.005	2 Interpretation	Impervious surfaces	Support	Supports the definition of impervious surfaces, in particular the exclusions. Submits that technical guidance should be provided on the detail of how to achieve porous/permeable paving and the reticulation/storage systems required for water collection and reuse.	Provide technical guidance on the detail of how to achieve porous/permeable paving and the reticulation/storage systems required for water collection and reuse.
S220.006	2 Interpretation	Redevelopment	Support	Supports the definition of redevelopment, in particular the exclusions.	Retain as notified
S220.007	2 Interpretation	Stormwater	Support	Supports the definition of stormwater, in particular the exclusions. Notes a typographical error referring to rules in sections "8.2 and 9.2", which should refer to sections 8.3 and 9.3.	Correct typographical error to refer to correct sections.
S220.008	2 Interpretation	Stormwater treatment system	Support	Supports the definition of stormwater treatment system, in particular the inclusions for the use of infiltration trenches and proprietary devices are supported.	Retain as notified
S220.009	5.4 Beds of lakes and rivers	Rule R128: New structures - permitted activity.	Oppose	Notes Rule R128 was originally promulgated to reduce the need to obtain permits for minor structures needed in the bed of a watercourse/lake provided the works met the general standards. Opposes the changes as they reduce the scope of activities that would be permitted.	Retain the operative rule R128.
S220.010	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Oppose	Notes one of the stated policy methods is to prohibit unplanned greenfield development and therefore opposes this policy.	Amend the policy to restrict discharges from unplanned greenfield development.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S220.011	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Support	Supports the policy and notes the requested changes to the definition of high risk industrial or trade premises are consistent with the policy.	Retain as notified
S220.012	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Oppose	Opposes the policy. Notes the policy does not specify at what rate/frequency the stormwater treatment is to be achieved. Considers it is not clear from the policy whether the stormwater treatment system is to accommodate the annual rainfall at once, or whether the treatment is achieved over a daily, weekly or monthly period. Considers that the design and sizing of a stormwater treatment system should be based on the average weekly rainfall.	The design and sizing of a stormwater treatment system should be based on the average weekly rainfall.
S220.013	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Oppose	Notes this policy seeks to avoid all stormwater discharges to water from unplanned greenfield development (as mapped) and opposes this policy. Considers that an avoidance policy is too restrictive to be applied to such large areas of the City, even if they are non-urban.	Amend to a minimisation policy.
S220.014	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield	Amend	Considers that as there is no definition of greenfield development, there is uncertainty as to which rule (WH.R6 or WH.R7) would apply to a development.	Include definition of greenfield development

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		impervious surfaces - controlled activity.			
S220.015	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Amend	Considers that as there is no definition of greenfield development, there is uncertainty as to which rule (WH.R6 or WH.R7) would apply to a development.	Include definition of greenfield development
S220.016	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Opposes the prohibited activity status of Rule WH.R13 and considers that there should be an ability to seek a regional consent for the stormwater discharge from impervious surfaces associated with new unplanned greenfield development, particularly where the territorial authority supports a development, including via a plan change process.	Amend rule WH.R13 to be a non-complying activity.
S220.017	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Oppose	Opposes the restrictions that no sediment can be discharged from a site during earthworks. Notes it is common practice to utilise erosion and sediment control measures during an earthworks operation, but it would be near impossible to guarantee that site development could prevent any and all discharges of sediment from the site in all weather events.	Apply a more pragmatic measure for the limit of sediment that can be discharged. Either cross reference to the permitted standards under rule WH.R3; or use some other practical measurement of the amount of sediment in stormwater runoff.
S220.018	8 Whaitua Te	Rule WH.R24:	Amend	Considers that this rule should include a non-notification clause.	Amend Rule WH.R24 to include a non-notification clause.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	Earthworks - restricted discretionary activity.			
S220.019	12 Schedules	Schedule 30: Financial Contributions.	Oppose	Opposes the contribution calculations outlined in Part D of Schedule 30 , in particular the inclusion of a financial contribution for non-residential greenfield development (Table D2) for the Whaitua Te Whanganui-a-Tara. Considers there does not appear to be any basis for charging a financial contribution on non-residential greenfield development within the Whaitua Te Whanganui-a-Tara. Re-iterates that a definition of greenfield development is required. Notes that if no non-residential greenfield development is anticipated in Whaitua Te Whanganui-a-Tara, it would be unlikely that the consent authority would allocate any budget in their long-term plans for the offsetting works required and therefore the imposition of a financial contribution would not be able to satisfy s111 RMA.	Not stated
S220.020	12 Schedules	D Calculation of level of contribution	Oppose	Notes the calculation of the financial contribution for non-residential development under Part D does not specify what area of the development is used for the calculation. Questions if the measurement of "per 100m2" is based on the site area, the developed area or the impervious area?	Amend clause D of Schedule 30 as follows: Financial contributions shall be calculated per EHU for residential greenfield development (Table D1), or per 100m2 of impervious area for non-residential greenfield development and new roads/state highways (not in direct support of a greenfield development) (Table D2).
S220.021	13 Maps	Map 89: Unplanned greenfield areas - Hutt City Council.	Oppose	Opposes the inclusion of the site at 30 Benmore Crescent within the HCC unplanned greenfield area as shown on Map 89. Notes the site is currently zoned General Rural in the LHCC District Plan but the Draft District Plan Review proposes to rezone the site as General Industrial. Notes the site has been subject to resource consents and is currently subject to additional resource consent applications, and Rosco	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				and LHCC have been involved in planning for the development of the site for the last three years	

S057 Sally Kean

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S57.001	General comments	General comments - overall	Oppose	Considers the proposed provisions for lifestyle blocks are not suitable for properties under 10-20 hectares.	Not Stated
S57.002	General comments	General comments - rural	Not Stated	Believes that requirements to fence off waterways will increase fire risk as a result of uncontrolled shrub and grass growth.	Not Stated
S57.003	General comments	General comments - overall	Not Stated	Believes that GWRC as an authority should not enforce restrictions on what can and can't be done with property.	Not Stated
S57.004	General comments	General comments - current legislation	Not Stated	Feels GWRC should not be making any changes until the RMA has been revamped.	Opposes GWRC making decisions until the RMA is revamped (inferred).
S57.005	General comments	General comments - consultation	Not Stated	Concerns the notification process was not suitable and believes a letter drop process should have been used. Believes the PC1 document is too lengthy to read and hard to understand.	Amend notification process to include a letter drop rather than solely newspaper advertisements (inferred).
S57.006	General comments	General comments - economic cost/impact	Not Stated	Opposes GWRCs attempt to control the materials and conditions of driveways.	Not Stated
S57.007	General comments	General comments - overall	Not Stated	Considers PC1 is regulatory over-reach.	Not Stated

S189 Samuel Kahui

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S189.001	9 Te Awarua-o-Porirua Whaitua	Objective P.O2: Te Awarua-o-Porirua's groundwater, rivers, lakes and natural wetlands, and their margins are on a trajectory of measurable improvement towards wai ora.	Amend	Believes using the word 'maintain' is not sufficient	Remove the word 'maintenance' from point (h) of Objective P.O2
S189.002	General comments	General comments - overall	Support	Supports the direction in PC1 and urges Councillors to continue to support these changes through to their implementation. Considers PC1 must solve some of the biggest problems including aging and leaky infrastructure, inappropriate urban development and poor land use practices and a strong and enforced regulatory backbone is required.	Not stated
S189.003	General comments	General comments - water quality improvements	Support	Considers there has not been enough care for the health of harbours, estuaries, rivers, lakes, streams, wildlife and communities have suffered as a result, and action must be taken. Suggests the regional plan must drive improvement and no longer allow inaction, declining water quality or inefficient water use. Supports measures in Plan Change 1 that will, if implemented properly end harmful wastewater entering directly into our streams and coastal	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				waters, water sensitive urban design becoming the norm in towns and cities of our region, and farms and plantation forests no longer harming waterways and the wildlife that live in them. Considers these are the first steps on the journey to restoring Te Mana o Te Wai - the dignity, integrity, significance, power of water - and our water regaining its mauri. Considers that development done right is possible and built environments can be weaved into the natural world.	
S189.004	General comments	General comments - economic cost/impact	Support	Notes PC1 will be expensive but that true costs of not implementing PC1 are huge, felt over multiple generations and may be irreversible. Considers GWRC can provide the framework and assist with the collaboration of mana whenua, communities, and stakeholders in the restoration and celebration of Wai and natural environments. Mā whero, mā pango ka oti ai te mahi.	Support PC1 through to implementation.
S189.005	General comments	General comments - target attribute states	Support	Supports the timeframes for achieving the target attribute states set out in PC1, noting that in many cases these are only first step improvements to reverse the decline and get water quality above national bottom lines.	Not stated
S189.006	8 Whaitua Te Whanganui-a-Tara	Objective WH.O8: Primary contact sites within Te Awa Kairangi/Hutt River, Pākuratahi River, Akatarawa River and Wainuiomata River are suitable for	Support	Not stated	Support to improve Wai TAS to achieve safe access and contact.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		primary contact.			

S110 Save Our Hills (Upper Hutt) Incorporated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S110.001	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Support	Seeks stormwater discharges from Upper Hutt City Council's (UHCC) proposed "Southern Growth Area (SGA)" (i.e. Guildford Timber Company's proposed development on Pinehaven Hills) are not permitted until the Pinehaven Stream baseline flood model has been rectified to ensure hydrological control, and the Pinehaven Floodplain Management Plan has been updated to incorporate the rectified Pinehaven Stream flood model. Considers if this is not done then hydrological control (including hydraulic neutrality) will not happen with consequences for the environment, for natural resources, private property, human life and public safety. Supports Map 88 which identifies the Upper Hutt City Council's proposed "Southern Growth Area" (i.e. Guildford Timber Company's proposed development on Pinehaven Hills) as "unplanned greenfield development".	Do not allow any new stormwater discharges from unplanned greenfield development where the discharge will enter a surface water body or coastal water, including through an existing local authority stormwater network.

S196 Sera Moran

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S196.001	General comments	General comments - overall	Oppose	Opposes PC1.	Withdraw PC1.
S196.002	General comments	General comments - consultation	Oppose	Concerned the rural community only discovered PC1 by word of mouth .	Withdraw PC1.
S196.003	6 Other methods	6.17 Small farm property registration	Oppose	Concerned with requirement for small farms to be registered and to provide complex information. Considers large animals/livestock welfare should remain under MPI not GWRC.	Delete the requirement for farms of 4 ha to register with GWRC.

S095 Sharyn Hume

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S95.001	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Support	Supports range of financial support options for land retirement but would like to see compensation included for large-scale land retirement. Seeks that a farm-scale approach be better integrated into sediment and erosion control policies and rules.	Prioritise this work prior to implementing new rules.
S95.002	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Amend	Considers modelling assumptions are not fit for purpose, and lack of local water quality monitoring data makes it hard to see where the water quality issue is and what solutions to implement.	Include increased GWRC support for additional water quality monitoring activities in Mākara and Ohariu, including community led.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S95.003	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Amend	Lack of consistency with WH.P22 (nitrogen) and WH.P23 (sediment). Thinks works to reduce e-coli levels should only target areas where e-coli is shown to be an issue, and there is not enough data to determine the levels and sources of e-coli across the area's multiple catchments. Local water quality studies need to be carried out and the option for landowner-led, farm-scale monitoring provided for, including monitoring of the impact from actions taken.	Add "Incorporate e-coli reduction in catchment context and farm plans, based on monitored data"
S95.004	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	Concern about accuracy of mapping and modelling, considers modelling is not fit for purpose in Makara/Ohariu. Considers the policy needs to allow for a farm-scale assessment of sediment sources. Concern about PC1 focus on hill country erosion rather than streambank erosion in high flows which is anecdotally a greater contributor to sediment losses. Does not support revegetation of vulnerable areas of farmland - but notes there are options for revegetation sites that best work within the farm system. Areas forced into retirement will be much bigger than the mapped areas due to the need to aggregate areas and work with the landscape to locate fence lines.	Identify sediment sources by using a farm-scale assessment rather than the erosion-risk mapping proposed. Refocus this section on identifying "sediment sources" rather than solely erosion risk.
S95.005	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high	Amend	Wants to see broader focus on sources of sediment rather than just erosion on hillsides.	Refocus from "erosion risk" to "sediment management".

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		risk of erosion.			
S95.006	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Oppose	Concern the provision will financially impact farms due to the timeframes and requirement to retire land from grazing. Concern that some woody vegetation will not be successful on steepest areas and fencing and retiring land will be the only tool available. Considers native planting will not be affordable on this scale, and it will be unviable to maintain woody vegetation given the large-scale land retirement and reduced farm income from reduced production and high fencing costs. Considers modelling is inaccurate and farmland with no actual erosion issue should not need to be retired.	Remove this blanket approach and instead rely on the bespoke actions and timeframes that will be identified through farm-scale assessment, including through audited Freshwater Farm Plans.
S95.007	8 Whaitua Te Whanganui-a-Tara	Policy WH.P26: Managing livestock access to small rivers.	Amend	Make this policy consistent with the associated rule regarding reduced access rather than restricted access. Concerned about high cost and practicalities of fencing streams in some areas.	Replace "restrict" with "reduce through non- regulatory means". Amend the policy wording to match the heading scope about river size.
S95.008	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Oppose	Concerns about livestock access to streams for drinking water due to risk around reticulated water supply infrastructure functioning well in hill country paddocks. Considers a farm-scale approach would help identify solutions, including ponds for stock water and sediment retention.	Delete policy since this can instead be incorporated into certified/audited Freshwater Farm Plans.

S235 Shonaugh Wright

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S235.001	General comments	General comments - overall	Not Stated	Submitter values the water quality values of the following areas for contact recreation and ecosystem health: i. Te Awakairangi / the Hutt River ii. Akatarawa River iii. Whakatikei River iv. Titahi Bay v. Lyall Bay vi. Otaki River Considers the natural form and character of these waterbodies is an important part of their value. Natural form and character creates rapids and other features of these sections of river that make them valuable for kayaking. Te Awakairangi / the Hutt Gorge is an outstanding run for whitewater kayaking, which traverses what they consider an outstanding landscape with outstanding amenity values. Would like to see the outstanding value of this section of river recognised in the plan. The natural and wildlife values of these areas are also important to submitter.	Requests the outstanding value of this section [Te Awakairangi / the Hutt Gorge] of river recognised in the plan.
S235.002	General comments	General comments - freshwater	Not Stated	Observes algae in summer months when flows are low resulting in issues with recreation and amenity as well as human health when making contact with water. Concerns that river engineering such as railway iron degrades water quality and creates potential hazards for river users when slash and logs get caught on structures	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S235.003	General comments	General comments - overall	Support	Supports PC1 and the initiatives to improve water quality in the catchment.	Requests that GWRC initiatives are carried through to the operative plan, particularly where they protect and restore ecosystem health, contact recreation values, natural form and character, and amenity.
S235.004	General comments	General comments - freshwater	Support	Supports the concept of Te Mana o te Wai and the hierarchy of obligations.	Prioritise ecosystem health and contact recreation prioritised.
S235.005	General comments	General comments - water quality improvements	Support	Key concerns are water quality (particularly e. coli, sediment, algal growth/periphyton, and ecosystem health); amenity; contact recreation; and natural form and character.	Suggests the outstanding kayaking values in the Whaitua recognised in the plan, particularly for the Hutt Gorge (which has outstanding kayaking, amenity, and landscape values). Recognition in the plan of the outstanding kayaking/packrafting/rafting values in the Whaitua, particularly for the Hutt Gorge (which has outstanding kayaking, amenity, and landscape values) More work by GWRC to monitor and preserve natural character and to strengthen objectives, policies, and rules which allow the river to function more naturally, particularly in its reaches influenced by flood protection Targets for natural character that are similar to the targets set for water quality and objectives and policies to support these More work to enhance water quality in the coastal environment, for use of 'flat water' environments to learn and train without compromising health if contact is made with the water Retain coastal water quality indicators/targets.
S235.006	General comments	General comments - target attribute states	Support	Supports targets in the water quality target tables	Requests as much work as possible is done through environmental limits to achieve these targets.

S099 Simon Wright

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S99.001	General comments	General comments - overall	Support	Supports PC1 and the rules and incentives that will make development more sustainable. PC1 will not just help address environmental challenges but will inspire innovation with unexpected social and economic benefits that may have impacts beyond the Wellington region. Considers it is unacceptable to allow developments that pollute the water or degrade the land, or for associated costs to be socialised and/or passed on to future generations.	Not stated
S99.002	General comments	General comments - overall	Support	Important that compliance is achieved and that monitoring for impacts and outcomes occurs. Compliance teams will need to be adequately resourced.	Not stated
S99.003	General comments	General comments - overall	Support	Suggests the use of participatory approaches that encourage and support members of the public to contribute. This might be through the education system, citizens science, participatory evaluation or re-purposed Whaitua committees.	Not stated

S013 Sofia Holloway

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S13.001	9 Te Awarua-o-Porirua Whaitua	Objective O18: Rivers, lakes, natural wetlands and coastal water are suitable	Support	Aligns with greater Wellington region's values	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		for contact recreation and Māori customary use.			
S13.002	9 Te Awarua-o-Porirua Whaitua	Policy P36: Restoring Wairarapa Moana	Amend	Seeks inclusion of Wellington Harbour (Port Nicholson).	Amend Policy P36 as follows: 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:
S13.003	5.1 Air quality rules	Rule R10: Untreated wood - permitted activity.	Support	Aligns with central government direction.	Retain as notified
S13.004	5.1 Air quality rules	5.1.8 Food, animal or plant matter manufacturing and processing .	Support	Aligns with central government direction.	Retain as notified

S262 Southern North Island Wood Council

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S262.001	General comments	General comments - plantation forestry	Not Stated	Supports the inclusion of Te Mana o te Wai in the NPS-FM. However, considers the rules need to be supported by appropriate evidence, implemented in accordance with relevant statutory provisions and consistent with the NES-CF Framework.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S262.002	General comments	General comments - overall	Not Stated	Considers that PC1 is inconsistent with the whaitua committee recommendations and is too onerous.	Not stated
S262.003	General comments	General comments - plantation forestry	Not Stated	Considers there has been no consideration for ETS implication with the removal of land from production.	Not stated
S262.004	General comments	General comments - maps	Not Stated	Considers there are impracticalities of the current erosion mapping class system. Considers the resolution too low and does not reflect forest scale erosion risk.	Not stated
S262.005	General comments	General comments - maps	Not Stated	Considers PC1 poses a significant risk to forest investment in the region. Considers the loss of productive area, often for no major environmental gains, lowers land values, wards off investment and has a direct economic impact on people of the region.	Not stated
S262.006	General comments	General comments - plantation forestry	Not Stated	Notes commercial forestry is a major export earner and employer of local people and service providers during establishment, management and harvesting; and at the port and local sawmills. Notes in the two Whaituas the total area in plantation forest is almost 12,000 ha. Notes that as well as income and employment, plantation forests provide major environmental benefits relating to climate regulation, reducing erosion, and preventing sediment getting into waterways. Notes forests also act as a carbon sink and help mitigate climate change, and that the Climate Change Commission has recommended a national increase in the plantation forest estate by 500,000 ha between 2021 and 2030.	Not stated
S262.007	General comments	General comments -	Not Stated	States that plantation forests discharge less sediment than other commercial land uses, citing the Pakuratahi Land Use Study by Garth Eyles and Barry Fahey.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		plantation forestry		States that monitoring shows water quality is higher in catchments with significant forest cover, compared to other land uses. Concerned that PC1 will result in a decline in commercial forestry, resulting in adverse economic and environmental effects.	
S262.008	General comments	General comments - plantation forestry	Not Stated	Considers that PC1 deters investment in commercial forestry, primarily due to the proposed rules and associated costs, which may hinder harvesting of certain lands. Concerned that the "highest risk" classification of land will diminish land value for forest owners. Considers that PC1 is inconsistent with local and national climate objectives.	Not stated
S262.009	General comments	General comments - plantation forestry	Not Stated	States the s32 report attributes current water quality issues to forestry without sufficient supporting evidence. Considers that recent NES-CF changes are sufficient to protect freshwater.	Not stated
S262.010	General comments	General comments - plantation forestry	Not Stated	Notes the NES-CF was altered to include permanent carbon forestry to fix a loop hole related to resource consents and notifications. Considers PC1 will severely impact forest owners in the region with ETS registered forests. Notes one member of the submitter's organisation will lose between 4% and 18% of productive area by forest, which equates to 330ha. The ETS Liability on this area at current prices is approximately $18 million NZD.	Not stated
S262.011	General comments	General comments - plantation forestry	Not Stated	Considers there is insufficient evidence to suggest that: - there is an issue with sediment produced from plantation forestry; - the NES-CF has led to more adverse environmental outcomes compared to the pre-2018 consenting regime; - that either forestry or the NES-CF are attributed to current water quality issues.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Disagrees with the s32 evaluation of the social costs for Options 1 and 3 being minimal, due to job losses in plantation forestry operations, at the port, and regional sawmills. Considers that the NES-CF is sufficient to manage sediment from forestry activities.	
S262.012	General comments	General comments - plantation forestry	Not Stated	Considers the analysis of monetary implications in the s32 report is insufficient as it is feasible to estimate costs of resource consent applications, consent processing and monitoring, devaluation of forestry land, a decline in economic activity and forfeiture of income from timber and carbon credits. Considers s32 should explicitly acknowledge high and medium economic costs for Option 1 and Option 3, respectively. Notes further economic considerations, being devaluation of forest land; decline in economic activity; and loss of income from timber and carbon credits. Considers the economic costs for Option 1 (as evaluated in the s32 report) will be substantial, and moderate for Option 3, both resulting in an overall "negative benefit".	Not stated
S262.013	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Oppose	Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.	Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain rules in the NES-PF. Object to any other substitution of rules in the NES-PF with new rules in the plan. Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry. Seek that replanting will not to be regulated in the plan.
S262.014	8 Whaitua Te	Policy WH.P28: Achieving	Oppose	Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted,	Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	reductions in sediment discharges from plantation forestry.		including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.	prevail over certain rules in the NES-PF. Object to any other substitution of rules in the NES-PF with new rules in the plan. Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry. Seek that replanting will not to be regulated in the plan.
S262.015	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Oppose	Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.	Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain rules in the NES-PF. Object to any other substitution of rules in the NES-PF with new rules in the plan. Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry. Seek that replanting will not to be regulated in the plan.
S262.016	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry - discretionary activity.	Oppose	Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.	Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain rules in the NES-PF. Object to any other substitution of rules in the NES-PF with new rules in the plan. Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry. Seek that replanting will not to be regulated in the plan.
S262.017	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest	Oppose	Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules	Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain rules in the NES-PF.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		erosion risk land - prohibited activity.		which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.	Object to any other substitution of rules in the NES-PF with new rules in the plan. Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry. Seek that replanting will not to be regulated in the plan.
S262.018	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Oppose	Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.	Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain rules in the NES-PF. Object to any other substitution of rules in the NES-PF with new rules in the plan. Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry. Seek that replanting will not to be regulated in the plan.
S262.019	9 Te Awarua-o-Porirua Whaitua	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Oppose	Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.	Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain rules in the NES-PF. Object to any other substitution of rules in the NES-PF with new rules in the plan. Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry. Seek that replanting will not to be regulated in the plan.
S262.020	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry - controlled activity.	Oppose	Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in	Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain rules in the NES-PF. Object to any other substitution of rules in the NES-PF with new rules in the plan.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.	Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry. Seek that replanting will not to be regulated in the plan.
S262.021	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry - discretionary activity.	Not Stated	Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.	Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain rules in the NES-PF. Object to any other substitution of rules in the NES-PF with new rules in the plan. Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry. Seek that replanting will not to be regulated in the plan.
S262.022	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity.	Not Stated	Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.	Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain rules in the NES-PF. Object to any other substitution of rules in the NES-PF with new rules in the plan. Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry. Seek that replanting will not to be regulated in the plan.

S031 Stormwater360

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S31.001	6 Other methods	Method M43: Supporting	Not Stated	Suggests overseas approaches to managing stormwater discharge are examined to confirm treatment goals are achievable and monitorable,	Seeks that the types of approaches used in the USA be applied to NZ to ensure the best outcomes for the environment.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		the health of urban waterbodies.		cites California and Washington examples. Suggests a model of individual site monitoring of stormwater discharges is used rather than blanket concentration requirements and considers defining influent vs effluent and using dissolved metals only is a more applicable way to measure treatment efficiencies than percent removal alone. Suggests there should be a clear process and register for any proprietary device 'deemed to comply'.	
S31.002	6 Other methods	Method M45: Funding of wastewater and stormwater network upgrades	Not Stated	Suggests overseas approaches for funding strategies and ideas are investigated, noting payment from manufacturers for certification of proprietary treatment devices as an example.	Not stated
S31.003	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Not Stated	Target attribute states refer to dissolved metals concentration whereas Schedule 28 (Table 1 and Table 2) refer only to the percentage of Copper or Zinc to be removed. Suggest consistency throughout rules/ policies.	Define speciation throughout stormwater rules to achieve TAS defined in Table 8.4. Table 1 and 2 of Schedule 28: Stormwater Contaminant Treatment should reflect dissolved metals.
S31.004	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Not Stated	Supports no exposed zinc and copper building materials in new development sites and considers there is an opportunity to regulate retrofitting treatment to downpipes for existing/ sites with high contaminant loading (notes this could fit better under Rule WH.R4). Cites study into urban sources of copper, lead and zinc by Auckland Regional Council.	Not stated
S31.005	9 Te Awarua-	Table 9.2: Target	Not Stated	Target attribute states refer to dissolved metals concentration whereas Schedule 28 (Table 1 and	Define speciation throughout stormwater rules to achieve TAS defined in Table 8.4.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	attribute states for rivers.		Table 2) refer only to the percentage of Copper or Zinc to be removed. Suggest consistency throughout rules/policies.	Table 1 and 2 of Schedule 28: Stormwater Contaminant Treatment should reflect dissolved metals.
S31.006	12 Schedules	Schedule 28: Stormwater Contaminant Treatment.	Amend	Support the use of a treatment train approach but suggests approach defined is outdated and doesn't take the influent contaminants concentration or the PSD into account. Suggests the range of allowable influent concentration for contaminants should be defined and specific parameters for influent and effluent should be defined for various treatment types.	Not stated
S31.007	12 Schedules	Table 1: Target load Reductions for Copper and Zinc	Amend	Suggests target load reductions are unrealistic and questions where the 90% removal via bioretention comes from and why TSS isn't considered under the schedule. Notes the speciation is not defined and questions if the Schedule refers to Total Copper and Total Zinc, and if so this is inconsistent with the Target Attribute States (TAS) as the units for measurement in TAS are dissolved concentrations - suggests consistent measurement is better. Notes that heavy metals are transported via suspended solids and so there might be a reason to include TSS in the target load reductions. Cites water research foundations stormwater BMP database summary.	Not stated

S044 Sue Hawkins

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S44.001	2 Interpretation	Highest erosion risk land (plantation forestry)	Oppose	Farms should be assessed on a singular basis due to diverse contours in the Makara/Ohariu region. Already controlled by RMA regulations and forestry rules. Lack of evidence to support assumption that steep slopes are a significant source of sediment.	REVIEW the general conditions relating to Forestry on risk land.
S44.002	2 Interpretation	Sacrifice paddocks	Oppose	Concerned about the financial implications of sacrificing paddocks and the practicalities of fencing off rivers due to the nature of the land. The area has been involved in revegetation projects and pest control activities. Fencing off the river will be impractical due to the nature of the slopes, and previous flood damage has caused loss of structures, causing more damage downstream. Could meet council description of Clean Green Belt descriptive.	No decision requested but seeks an independent review of the provision.
S44.003	8 Whaitua Te Whanganui-a-Tara	Policy WH.P26: Managing livestock access to small rivers.	Oppose	Change to "manage livestock access with temporary fencing where practical. Given that some of the area could be flood prone.	Amend Policy WH.P26 as follows... ~~Restrict livestock to small rivers~~

S038 Summerset Group Holdings Limited

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S38.001	2 Interpretation	Hydrological control	Amend	Questions how the definition will assist in the interpretation of provisions as it does not outline what the controls are.	Amend definition to outline what hydrological controls are, including examples and a schedule with technical standards.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S38.002	2 Interpretation	Impervious surfaces	Amend	Considers roofing with rainwater collection, complying with hydraulic neutrality rules included in recent district plans in these catchments should not be considered an impervious surface. Suggests that the implementation of grey water reuse would add to development costs, and is not a requirement of any regulation including PC1 or the NRP.	Amend definition as follows: Surfaces that prevent or significantly impede the infiltration of stormwater into soil or the ground, includes: • roofs • paved areas (including sealed/compacted metal) such as roads, driveways, parking areas, sidewalks/foot paths or patios, and excludes: • grassed areas, gardens and other vegetated areas • porous or permeable paving • slatted decks which allow water to drain through to a permeable surface • porous or permeable paving and living roofs • roof areas with rainwater collection ~~and reuse~~ ~~• any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)~~
S38.003	2 Interpretation	Redevelopment	Amend	Considers extensions to existing buildings should be excluded from the definition to allow a baseline for small redevelopments of existing sites as a permitted activity in associated rules.	Amend definition as follows: For the purpose of assessment of a proposal involving the redevelopment of an existing urbanised property (i.e. including brownfield development upgrades to existing roads etc.) in relation to stormwater effects. this includes the replacement, reconstruction or addition (new) of impervious surfaces. Excludes: • minor maintenance or repairs to roads, carparking areas, driveways and paving • installation, maintenance or repair of underground infrastructure or network utilities requiring trenching and resurfacing • activities that only involve the re-roofing of existing buildings • **extensions to existing buildings**
S38.004	2 Interpretation	Unplanned greenfield development	Oppose	Definition relates to associated prohibited activity rules that the submitter opposes.	Delete definition: ~~Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 which also require an underlying zone change (from rural/nonurban/ open space to urban) though a District Plan~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					~~change to enable the development.~~ ~~Note: Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023.~~
S38.005	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	Opposes prohibiting unplanned greenfield growth. 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 inappropriate in terms of effects management 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.	Amend policy: Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (a) ~~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 (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers, and (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.
S38.006	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse	Amend	Considers PC1 to be lacking in sufficient detail on the types of hydrological controls and water sensitive designs required for various types and scales of development.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions.

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		effects of stormwater discharges.		Concerned compliance with this policy will be difficult and require expensive bespoke solutions as there are no technical guidelines/ compliant solutions incorporated into the plan change. For example, the creation of small areas of impervious surfaces should not require engineering advice to design site specific controls. Considers the cost of the approach on landowners/developers and the impacts on housing supply in the region has not been sufficiently assessed in the Section 32 Evaluation.	
S38.007	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Submits that as the cost of the 85% treatment requirement on landowners/ developers, and the impacts on housing supply in the region has not been sufficiently assessed in the Section 32 Evaluation, it is potentially inconsistent with the NPS-UD.	Review 85% treatment requirement based on complete economic analysis including impacts on housing and business land supply throughout the region.
S38.008	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Oppose	Considers the policy is inconsistent with the NPS-UD including Policy 8 as the cost of the approach proposed on landowners/developers and its impacts on housing supply in the region has not been sufficiently assessed in the Section 32 Evaluation. Questions how the policy interacts with the prohibited activity approach for unplanned greenfield development.	Delete policy: ~~Policy WH.P15: Stormwater contaminant offsetting for new greenfield development~~ ~~The adverse effects of residual (post-treatment) stormwater contaminants from new greenfield development, roads (not already captured as part of a greenfield development) and state highways where the discharge will enter a surface water body or coastal water, including via an existing or new stormwater network, are to be offset by way of a financial contribution in accordance with Schedule 30 (financial contribution).~~
S38.009	8 Whaitua Te	Policy WH.P16: Stormwate	Oppose	Opposes the avoidance/prohibited approach being taken to greenfield development	Delete policy: ~~Policy WH.P16: Stormwater discharges from new unplanned greenfield development~~

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	Whanganui-a-Tara	r discharges from new unplanned greenfield development.		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 use of a prohibited activity status is not justified in the Section 32 Evaluation and is not consistent with the NPS-UD.	~~Avoid all new stormwater discharges from unplanned greenfield development where the discharge will enter a surface water body or coastal water, including through an existing local authority stormwater network.~~
S38.010	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose	Opposes the requirement to seek a non-complying resource consent to undertake winter earthworks. Considers the S32 statement that there is higher risk for discharges of sediment over the winter period the incorrect. Suggests that large rain events, that can occur at any time, cause larger pulses of sediment . Suggests current practices for the management of winter earthworks managed through conditions of consent with oversight from Council monitoring staff be retained.	Delete policy: ~~Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall:~~ ~~(a) be shut down from 1st June to 30th September each year, and~~ ~~(b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).~~
S38.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Amend	Territorial authorities control new connections to discharge to the network and considers the rule requires all new connections to the stormwater network to obtain a regional resource consent.	Amend rule as follows: Rule WH.R2: Stormwater to land - permitted activity The discharge of stormwater onto or into land, including where contaminants may enter groundwater: (a) that is not from a high risk industrial or trade premise, or (b) that is not connected to that does not discharge from, or to, a local authority stormwater network, is a permitted activity provided the following conditions are met: (...)
S38.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing	Amend	Territorial authorities control new connections to discharge to the network and considers the rule requires all new connections to the stormwater network to obtain a regional resource consent.	Amend rule: Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity

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		individual property to surface water or coastal water - permitted activity.			The discharge of stormwater from an existing individual property into water, or onto or into land where it may enter a surface water body or coastal water, (a) that is not from a high risk industrial or trade premise, or (b) that is not from a port, airport or state highway, or (c) **that is not connected to** ~~does not discharge from, or to,~~ a local authority stormwater network, is a permitted activity, provided the following conditions are met: (...)
S38.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Considers PC1 to be lacking in sufficient detail on the types of hydrological controls and water sensitive designs required for various types and scales of development. Concerned compliance with this policy will be difficult and require expensive bespoke solutions as there are no technical guidelines/ compliant solutions incorporated into the plan change. For example, the creation of small areas of impervious surfaces should not require engineering advice to design site specific controls. Considers the cost of the approach on landowners/developers and the impacts on housing supply in the region has not been sufficiently assessed in the Section 32 Evaluation.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions.
S38.014	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Considers PC1 to be lacking in sufficient detail on the types of hydrological controls and water sensitive designs required for various types and scales of development. Concerned compliance with this policy will be difficult and require expensive bespoke solutions as there are no technical guidelines/ compliant solutions incorporated into the plan change. Considers the cost of the approach on landowners/developers and the impacts on housing	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions.

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				supply in the region has not been sufficiently assessed in the Section 32 Evaluation.	
S38.015	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Amend	Considers PC1 to be lacking in sufficient detail on the types of hydrological controls and water sensitive designs required for various types and scales of development. Concerned compliance with this policy will be difficult and require expensive bespoke solutions as there are no technical guidelines/ compliant solutions incorporated into the plan change. Considers the cost of the approach on landowners/developers and the impacts on housing supply in the region has not been sufficiently assessed in the Section 32 Evaluation.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions.
S38.016	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Amend	Opposes the avoidance/prohibited approach being taken to greenfield development 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 use of a prohibited activity status is not justified in the Section 32 Evaluation and is not consistent with the NPS-UD.	Amend rule as follows: Rule WH.R12: All other stormwater discharges - non-complying activity The: (a) discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule WH.R2, or (b) discharge of stormwater into water or onto or into land where it may enter a surface water body or coastal water, that is not permitted by Rule WH.R3, or a restricted discretionary activity under Rules WH.R8 or WH.R9, or (c) discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule WH.R4, or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade premise that does not meet the conditions of Rule WH.R11, or (d) use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater into

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					water or onto or into land where it may enter water, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or WH.R7, or a discretionary activity under Rule WH.R10 or WH.R11,~~or a prohibited activity under WH.R13,~~ is a non-complying activity.
S38.017	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Opposes the avoidance/prohibited approach being taken to greenfield development 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 use of a prohibited activity status is not justified in the Section 32 Evaluation and is not consistent with the NPS-UD.	Delete rule: ~~Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity~~ ~~The use of land and the associated discharge of stormwater from impervious surfaces from unplanned greenfield development direct into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or proposed stormwater network, is a prohibited activity.~~
S38.018	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	Considers the 'and' after clause b was not intended to make earthworks not on a farm a consented activity	Amend rule as follows : Rule WH.R23: Earthworks - permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, ~~and~~ **or** (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or

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					flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).
S38.019	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	Opposes the requirement to seek a non-complying resource consent to undertake winter earthworks. Considers the S32 statement that there is higher risk for discharges of sediment over the winter period to be incorrect. Suggests that large rain events, that can occur at any time, cause larger pulses of sediment . Suggests current practices for the management of winter earthworks managed through conditions of consent with oversight form Council monitoring staff be retained.	Amend rule as follows: Rule WH.R24: Earthworks - restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~
S38.020	9 Te Awarua-	Policy P.P2: Managem	Amend	Opposes prohibiting unplanned greenfield growth. Concerned the activity status will provide no	Amend policy: Policy P.P2 Management of activities to achieve target

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	o-Porirua Whaitua	ent of activities to achieve target attribute states and coastal water objectives.		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.	attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (a) ~~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 (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers, and (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.
S38.021	9 Te Awarua-o-Porirua Whaitua	Policy P.P10: Managing adverse effects of stormwater discharges.	Amend	Considers PC1 to be lacking in sufficient detail on the types of hydrological controls and water sensitive designs required for various types and scales of development. Concerned compliance with this policy will be difficult and require expensive bespoke solutions as there are no technical guidelines/ compliant solutions incorporated into the plan change. For example, the creation of small areas of impervious surfaces should not require engineering advice to	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions.

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				design site specific controls. Considers the cost of the approach on landowners/developers and the impacts on housing supply in the region has not been sufficiently assessed in the Section 32 Evaluation.	
S38.022	9 Te Awarua-o-Porirua Whaitua	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Submits the cost of the 85% stormwater treatment requirement on landowners/ developers, and the impacts on housing supply in the region has not been sufficiently assessed in the Section 32 Evaluation, it is potentially inconsistent with the NPS-UD.	Review 85% treatment requirement based on complete economic analysis including impacts on housing and business land supply throughout the region.
S38.023	9 Te Awarua-o-Porirua Whaitua	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Oppose	Considers the policy is inconsistent with the NPS-UD including Policy 8 as the cost of the approach proposed on landowners/developers and its impacts on housing supply in the region has not been sufficiently assessed in the Section 32 Evaluation. Questions how the policy interacts with the prohibited activity approach for unplanned greenfield development.	Delete policy: ~~Policy WH.P15: Stormwater contaminant offsetting for new greenfield development~~ ~~The adverse effects of residual (post-treatment) stormwater contaminants from new greenfield development, roads (not already captured as part of a greenfield development) and state highways where the discharge will enter a surface water body or coastal water, including via an existing or new stormwater network, are to be offset by way of a financial contribution in accordance with Schedule 30 (financial contribution).~~
S38.024	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Oppose	Opposes the avoidance/prohibited approach being taken to greenfield development 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 use of a prohibited activity status is	Delete policy: ~~Policy P.P15: Stormwater discharges from new unplanned greenfield development~~ ~~Avoid all new stormwater discharges from unplanned greenfield development where the discharge will enter a surface water body or coastal water, including through an existing local authority stormwater network.~~ ~~Note~~ ~~Any unplanned greenfield development proposals will~~

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				not justified in the Section 32 Evaluation and is not consistent with the NPS-UD.	~~require a plan change to the regional plan alongside any required plan change to rezone land within the relevant district plan.~~
S38.025	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose	Opposes the requirement to seek a non-complying resource consent to undertake winter earthworks. Considers the S32 statement that there is higher risk for discharges of sediment over the winter period is incorrect. Suggests large rain events, that can occur at any time, cause larger pulses of sediment . Suggests current practices for the management of winter earthworks managed through conditions of consent with oversight from Council monitoring staff be retained.	Delete policy: ~~Policy P.P29: Winter shut down of earthworks~~ ~~Earthworks over 3,000m2 in area shall:~~ ~~(a) be shut down from 1st June to 30th September each year, and~~ ~~(b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).~~
S38.026	9 Te Awarua-o-Porirua Whaitua	Rule P.R2: Stormwater to land - permitted activity.	Amend	Territorial authorities control new connections to discharge to the network and considers the rule requires all new connections to the stormwater network to obtain a regional resource consent.	Amend rule as follows: Rule P.R2: Stormwater to land - permitted activity The discharge of stormwater onto or into land, including where contaminants may enter groundwater (a) that is not from a high risk industrial or trade premise, or (b) **that is not connected to** ~~that does not discharge from, or to,~~ a local authority stormwater network is a permitted activity provided the following conditions are met: (...)
S38.027	9 Te Awarua-o-Porirua Whaitua	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water -	Amend	Territorial authorities control new connections to discharge to the network and considers the rule requires all new connections to the stormwater network to obtain a regional resource consent.	Amend rule as follows: Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity The discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, from an existing individual property (a) that is not from a high risk industrial or trade premise, or (b) that is not from a state highway, or (c) **that is not connected to** ~~that does not discharge from,~~

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		permitted activity.			~~or to,~~ a local authority stormwater network is a permitted activity provided the following conditions are met: (...)
S38.028	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Considers PC1 to be lacking in sufficient detail on the types of hydrological controls and water sensitive designs required for various types and scales of development. Concerned compliance with this policy will be difficult and require expensive bespoke solutions as there are no technical guidelines/ compliant solutions incorporated into the plan change. For example, the creation of small areas of impervious surfaces should not require engineering advice to design site specific controls. Considers the cost of the approach on landowners/developers and the impacts on housing supply in the region has not been sufficiently assessed in the Section 32 Evaluation.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions.
S38.029	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Considers PC1 to be lacking in sufficient detail on the types of hydrological controls and water sensitive designs required for various types and scales of development. Concerned compliance with this policy will be difficult and require expensive bespoke solutions as there are no technical guidelines/ compliant solutions incorporated into the plan change. Considers the cost of the approach on landowners/developers and the impacts on housing supply in the region has not been sufficiently assessed in the Section 32 Evaluation.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions.

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S38.030	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas-controlled activity.	Amend	Considers PC1 to be lacking in sufficient detail on the types of hydrological controls and water sensitive designs required for various types and scales of development. Concerned compliance with this policy will be difficult and require expensive bespoke solutions as there are no technical guidelines/ compliant solutions incorporated into the plan change. Considers the cost of the approach on landowners/developers and the impacts on housing supply in the region has not been sufficiently assessed in the Section 32 Evaluation.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions.
S38.031	9 Te Awarua-o-Porirua Whaitua	Rule P.R11: All other stormwater discharges - non-complying activity.	Amend	Opposes the avoidance/prohibited approach being taken to greenfield development. 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 use of a prohibited activity status is not justified in the Section 32 Evaluation and is not consistent with the NPS-UD.	Amend rule: Rule P.R11: All other stormwater discharges - non-complying activity The: (a) discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule P.R2, or (b) discharge of stormwater into water or onto or into land where it may enter water, that is not permitted by Rule P.R3, or a restricted discretionary activity under Rule P.R8, or (c) discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule P.R4, or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade premise that does not meet the conditions of Rule P.R10, or (d) use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater water or onto or into land where it may enter water, that is not permitted by Rule P.R5, or a controlled activity under Rules P.R6 or P.R7, or a discretionary activity under Rule P.R9, ~~or a prohibited activity under Rule P.R12,~~ is a non-complying activity.

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S38.032	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Oppose	Opposes the avoidance/prohibited approach being taken to greenfield development. 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 use of a prohibited activity status is not justified in the Section 32 Evaluation and is not consistent with the NPS-UD.	Delete rule: ~~Rule P.R12: Stormwater discharges from new unplanned greenfield development - prohibited activity~~ ~~The use of land and the associated discharge of stormwater from impervious surfaces from unplanned greenfield development direct into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or proposed stormwater network, is a prohibited activity.~~
S38.033	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Amend	Considers the 'and' after clause b was not intended to make earthworks not on a farm a consented activity.	Amend rule: Rule P.R22: Earthworks - permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, ~~and~~ **or** (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal

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					marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).
S38.034	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Amend	Opposes the requirement to seek a non-complying resource consent to undertake winter earthworks. Considers the S32 statement that there is higher risk for discharges of sediment over the winter period the incorrect. Suggests that large rain events, that can occur at any time, cause larger pulses of sediment. Suggests current practices for the management of winter earthworks managed through conditions of consent with oversight from Council monitoring staff be retained.	Amend rule: Rule P.R23: Earthworks - restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~
S38.035	13 Maps	Map 86: Unplanned greenfield areas - Porirua City Council.	Oppose	Opposes the avoidance/prohibited approach being taken to greenfield development. 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 use of a prohibited activity status is	Delete map

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				not justified in the Section 32 Evaluation and is not consistent with the NPS-UD.	
S38.036	13 Maps	Map 87: Unplanned greenfield areas - Wellington City Council.	Oppose	Opposes the avoidance/prohibited approach being taken to greenfield development. 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 use of a prohibited activity status is not justified in the Section 32 Evaluation and is not consistent with the NPS-UD.	Delete map
S38.037	13 Maps	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Oppose	Opposes the avoidance/prohibited approach being taken to greenfield development. 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 use of a prohibited activity status is not justified in the Section 32 Evaluation and is not consistent with the NPS-UD.	Delete map
S38.038	13 Maps	Map 89: Unplanned greenfield areas - Hutt City Council.	Oppose	Opposes the avoidance/prohibited approach being taken to greenfield development. 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 use of a prohibited activity status is not justified in the Section 32 Evaluation and is not consistent with the NPS-UD.	Delete map

S182 Susan Boyle

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S182.001	General comments	General comments - overall	Not Stated	Agrees with the Maymorn Collective submission in all aspects	Not stated
S182.002	General comments	General comments - overall	Oppose	Opposed to the proposed Plan Change 1.	Not stated
S182.003	General comments	General comments - consultation	Not Stated	Concerned that affected landowners have not been adequately consulted and that PC1 is inconsistent with UHCC Plan Change 50.	Withdraw PC1 and conduct appropriate consultation and engagement.
S182.004	General comments	General comments - unplanned greenfield development	Not Stated	Strongly opposes new 'unplanned greenfield development' being prohibited. Considers decentralisation wastewater infrastructure will reduce the potential environmental impact from new developments. Considers GWRC should assess each development on its merits and the impact it has on the environment and any mitigations proposed.	Amend PC1 to allow application for a new 'unplanned greenfield development'. Areas covered by PC50r are not deemed to be 'unplanned greenfield development'.
S182.005	General comments	General comments - economic cost/impact	Not Stated	Concerned the environmental and social benefits have not been quantified through a specialist economic impact assessment. Challenges the credibility of the GWRC plan change.	Withdraw PC1 and undertake economic, social and cultural impact assessment to inform a revised plan change.
S182.006	General comments	General comments - overall	Not Stated	Concerned PC1 contains many errors and fails to define what some key terms mean, preventing stakeholders from understanding what is proposed, and make well informed submissions.	PC1 is redrafted correctly and resubmitted for consultation.
S182.007	General comments	General comments - overall	Not Stated	Concerned PC1 is inconsistent with the incoming Government's 2023 election platform, specifically that major towns and cities will be required to zone land for '30 years' worth of housing demand immediately.	Any decision that prohibits the ability to unlock land for housing as proposed by PC1 should be revised, to consider, the directive of Central Government policy initiatives, such as changes to the Resource Management Act.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S182.008	General comments	General comments - rural	Not Stated	Concerned PC1 does not address how GWRC will manage its own land including natural sediment movement on the land, streams being controlled by natural gravity and animal movements on the land and in streams. Also concerned that GWRC activity on the land has impacts on waterways and streams, particularly as a result of 1080 drops.	Withdraw PC1

S119 Susan Sturman

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S119.001	General comments	General comments - water quality improvements	Not Stated	Supports PC1's water elements. Considers there should be no dry weather discharges of wastewater into stormwater. Suggests that cross connections should be actively identified and fixed (at landowners expense if on private land). Concern of hygiene issues in waterways due to sewage contamination. Considers there should be no wet weather overflows of wastewater into stormwater and contamination should not be permitted just because it is raining. Considers anything allowing rain to enter the wastewater system should be actively identified and fixed (at landowners expense if on private lane).	Not stated
S119.002	General comments	General comments - overall	Not Stated	Considers that fines should be enforced for contaminant discharges. Concerned about the goals and timeframes set. Suggests small, achievable, and measurable goals	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				should be the focus and then assess the value provided and use feedback and innovation to continuously improve interventions. Considers that restoring water quality, preventing flooding, and protecting water supply is critical for council to fund and manage. Encourages councils to collectively resource enforcement, science, and complementary policy tools like education, industrial water plans, community governance, and citizen water-care activity.	
S119.003	8 Whaitua Te Whanganui-a-Tara	Policy WH.P19: Managing wastewater network catchment discharges.	Amend	Concerned that 2 per year is too permissive (WH.P19) because there is no constant real-time monitoring of **e Col**i in the waterways. Considers that finances should be put towards identifying and stopping the causes of rain entering wastewater networks instead of providing finances for managing overflows.	Not stated

S245 Tama Potaka, Minister of Conservation

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S245.001	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganu	Amend	Considers provision gives effect to Part II of the RMA and the NPS Freshwater Objectives and Policies, including Te Mana o te Wai. Questions the achievability of having planted margins in all waterbodies.	Amend bullet point two from: ~~"All freshwater bodies have planted margins"~~ to **"All freshwater bodies have vegetated margins where practicable."**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		i-a-Tara is progressively improved and is wai ora by 2100.			
S245.002	8 Whaitua Te Whanganui-a-Tara	Policy WH.P1: Improvement of aquatic ecosystem health.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend Policies to be consistent with NZCPS Policy 23. Requests adding a new paragraph with the following wording**(e) reducing contaminant and sediment loadings in stormwater at source, through contaminant treatment and by controls on land use activities.**
S245.003	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend Policies to be consistent with NZCPS Policy 23. Requests the following wording be added **Promoting design options that reduce flows to stormwater reticulation systems at source.**
S245.004	8 Whaitua Te Whanganui-a-Tara	Policy WH.P5: Localised adverse effects of point source discharge.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend Policies to be consistent with NZCPS Policy 23. Requests a new part which includes the relevant criteria from NZCPS Policy 23 (1). Wording proposed is as follows:**and by:** **(f) using the smallest mixing zone necessary to achieve the required water quality in the receiving environment; and** **(g) minimising adverse effect on the life-supporting capacity of water within a mixing zone.**
S245.005	8 Whaitua Te	Policy WH.P6:	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend Policies to be consistent with NZCPS Policy 23

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	Cumulative adverse effects of point source discharges.			
S245.006	8 Whaitua Te Whanganui-a-Tara	Policy WH.P8: Avoiding discharges of specific products and waste.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend Policies to be consistent with NZCPS Policy 23
S245.007	8 Whaitua Te Whanganui-a-Tara	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend Policies to be consistent with NZCPS Policy 23
S245.008	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend Policies to be consistent with NZCPS Policy 23
S245.009	8 Whaitua Te	Policy WH.P11: Discharge	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend Policies to be consistent with NZCPS Policy 23

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	s of contaminants in stormwater from high risk industrial or trade premises.			
S245.010	8 Whaitua Te Whanganui-a-Tara	Policy WH.P12: Managing stormwater from a port or airport.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend Policies to be consistent with NZCPS Policy 23
S245.011	8 Whaitua Te Whanganui-a-Tara	Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend Policies to be consistent with NZCPS Policy 23
S245.012	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend Policies to be consistent with NZCPS Policy 23

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		impervious surfaces.			
S245.013	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend Policies to be consistent with NZCPS Policy 23
S245.014	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend Policies to be consistent with NZCPS Policy 23
S245.015	8 Whaitua Te Whanganui-a-Tara	Policy WH.P17: General wastewater policy to achieve target attribute states and coastal objectives.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend Policies to be consistent with NZCPS Policy 23
S245.016	8 Whaitua Te Whanganui-a-Tara	Policy WH.P19: Managing wastewate	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend wording of (b) so it also requires prioritisation of removal of wet weather overflows in wastewater network sub-catchments in schedule F4 - sites with significant indigenous biodiversity values in the coastal marine area.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		r network catchment discharges .			Amend (f) wording as follows: Avoiding wastewater network catchment discharges entering **non target public or** private property **and** educational facilities. Request paragraph (i) is added. Wording proposed is as follows: **Avoiding where practicable and otherwise remedying cross contamination of sewage and stormwater systems.**
S245.017	8 Whaitua Te Whanganui-a-Tara	Policy WH.P20: Managing existing wastewater treatment plant discharges .	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Requests sites and routes be added after methods in paragraph (g)
S245.018	9 Te Awarua-o-Porirua Whaitua	Policy P.P1: Improvement of aquatic ecosystem health.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend policies to be consistent with NZCPS Policy 23. Requests paragraph (e) be added. Wording for paragraph is as follows: **(e) reducing contaminant and sediment loadings in stormwater at source, through contaminant treatment and by controls on land use activities.**
S245.019	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend policies to be consistent with NZCPS Policy 23 Requests a paragraph be added. Wording for paragraph is as follows: **Promoting design options that reduce flows to storm reticulation systems at source.**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		water objectives.			
S245.020	9 Te Awarua-o-Porirua Whaitua	Policy P.P4: Contaminant load reductions.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend policies to be consistent with NZCPS Policy 23
S245.021	9 Te Awarua-o-Porirua Whaitua	Policy P.P5: Localised adverse effects of point source discharges.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend policies to be consistent with NZCPS Policy 23 Requests a new part which includes the relevant criteria from NZCPS Policy 23 (1). Wording proposed is as follows:**and by:** **(f) using the smallest mixing zone necessary to achieve the required water quality in the receiving environment; and** **(g) minimising adverse effect on the life-supporting capacity of water within a mixing zone.**
S245.022	9 Te Awarua-o-Porirua Whaitua	Policy P.P6: Point source discharges.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend policies to be consistent with NZCPS Policy 23
S245.023	9 Te Awarua-o-Porirua Whaitua	Policy P.P7 Discharges to groundwater.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend policies to be consistent with NZCPS Policy 23
S245.024	9 Te Awarua-o-Porirua Whaitua	Policy P.P8 Avoiding discharges of specific products and waste.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend policies to be consistent with NZCPS Policy 23

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S245.025	9 Te Awarua-o-Porirua Whaitua	Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend policies to be consistent with NZCPS Policy 23
S245.026	9 Te Awarua-o-Porirua Whaitua	Policy P.P10: Managing adverse effects of stormwater discharges.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend policies to be consistent with NZCPS Policy 23
S245.027	9 Te Awarua-o-Porirua Whaitua	Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend policies to be consistent with NZCPS Policy 23
S245.028	9 Te Awarua-o-Porirua Whaitua	Policy P.P12: Managing stormwater network	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend policies to be consistent with NZCPS Policy 23

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discharges through a Stormwater Management Strategy.			
S245.029	9 Te Awarua-o-Porirua Whaitua	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend policies to be consistent with NZCPS Policy 23
S245.030	9 Te Awarua-o-Porirua Whaitua	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend policies to be consistent with NZCPS Policy 23
S245.031	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend policies to be consistent with NZCPS Policy 23

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		development.			
S245.032	9 Te Awarua-o-Porirua Whaitua	Policy P.P16: General wastewater policy to achieve target attribute states and coastal water objectives.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend policies to be consistent with NZCPS Policy 23
S245.033	9 Te Awarua-o-Porirua Whaitua	Policy P.P18: Managing wastewater network catchment discharges.	Not Stated	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Requests the wording of (b) be amended so it also requires prioritisation of removal of wet weather overflows in wastewater network sub-catchments in schedule F4 - sites with significant indigenous biodiversity values in the coastal marine area. Amend (f) wording as follows: Avoiding wastewater network catchment discharges entering **non target public or** private property **and** educational facilities. Request paragraph (i) is added. Wording proposed is as follows: **Avoiding where practicable and otherwise remedying cross contamination of sewage and stormwater systems.**
S245.034	9 Te Awarua-o-Porirua Whaitua	Policy P.P19: Managing existing wastewater treatment plant	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Requests **sites and routes** be added after methods in paragraph (g)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discharges.			
S245.035	9 Te Awarua-o-Porirua Whaitua	Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Amend policies to be consistent with NZCPS Policy 23
S245.036	8 Whaitua Te Whanganui-a-Tara	Rule WH.R33: Take and use of water in the Whaitua Te Whanganui-a Tara - restricted discretionary activity.	Amend	Considers more detail on fish screening would assist in processing water take consents. Recommends updated technical guidance from NIWA, included in Appendix 1 of submission, be applied.	Requests a reference be added to an appropriate appendix or schedule incorporating best practise national guidance in the following rules:**Te Wangainui-a-Tara Whaitua take and use Rule 33 Criteria 9 and Te Awarua -0-Porirua Whaitua Take and Use Rules R 30 Condition d) and 31 Criteria 5**
S245.037	9 Te Awarua-o-Porirua Whaitua	Rule P.R30: Take and use of water - permitted activity.	Amend	Considers more detail on fish screening would assist in processing water take consents. Recommends updated technical guidance from NIWA, included in Appendix 1 of submission, be applied.	Requests a reference be added to an appropriate appendix or schedule incorporating best practise national guidance in the following rules:**Te Wangainui-a-Tara Whaitua take and use Rule 33 Criteria 9 and Te Awarua -0-Porirua Whaitua Take and Use Rules R 30 Condition d) and 31 Criteria 5**
S245.038	9 Te Awarua-o-Porirua Whaitua	Rule P.R31: Take and use of	Amend	Considers more detail on fish screening would assist in processing water take consents. Recommends updated technical guidance from	Requests a reference be added to an appropriate appendix or schedule incorporating best practise national guidance in the following rules:**Te Wangainui-a-Tara Whaitua take and**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		water - restricted discretionary activity.		NIWA, included in Appendix 1 of submission, be applied.	**use Rule 33 Criteria 9 and Te Awarua -0-Porirua Whaitua Take and Use Rules R 30 Condition d) and 31 Criteria 5**
S245.039	9 Te Awarua-o-Porirua Whaitua	Rule P.R33: Taking and use of water that exceeds minimum flows or allocation amounts - prohibited activity.	Amend	Considers more detail on fish screening would assist in processing water take consents. Recommends updated technical guidance from NIWA, included in Appendix 1 of submission, be applied.	Requests a reference be added to an appropriate appendix or schedule incorporating best practise national guidance in the following rules:**Te Wangainui-a-Tara Whaitua take and use Rule 33 Criteria 9 and Te Awarua -0-Porirua Whaitua Take and Use Rules R 30 Condition d) and 31 Criteria 5**
S245.040	8 Whaitua Te Whanganui-a-Tara	Rule WH.R1: Point source discharges of specific contaminants - prohibited activity.	Support	Considers rules for stormwater discharges into the coastal and marine area need to give effect to NZCPS Policy 23 (4) matters a) - d).	Retain rule 1 as notified
S245.041	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to NZCPS Policy 23 (4) matters a) - d).	Amend rules R2-R13 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).
S245.042	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to NZCPS Policy 23 (4) matters a) - d).	Amend rules R2-R13 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		property to surface water or coastal water - permitted activity.			
S245.043	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to NZCPS Policy 23 (4) matters a) - d).	Amend rules R2-R13 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).
S245.044	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to NZCPS Policy 23 (4) matters a) - d).	Amend rules R2-R13 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).
S245.045	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to NZCPS Policy 23 (4) matters a) - d).	Amend rules R2-R13 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S245.046	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to NZCPS Policy 23 (4) matters a) - d).	Amend rules R2-R13 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).
S245.047	8 Whaitua Te Whanganui-a-Tara	Rule WH.R8: Stormwater from a port or airport - restricted discretionary activity.	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to NZCPS Policy 23 (4) matters a) - d).	Amend rules R2-R13 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).
S245.048	8 Whaitua Te Whanganui-a-Tara	Rule WH.R9: Stormwater from a local authority or state highway network- restricted discretionary activity.	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to NZCPS Policy 23 (4) matters a) - d).	Amend rules R2-R13 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).
S245.049	8 Whaitua Te	Rule WH.R10: Stormwate	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to	Amend rules R2-R13 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	r from new state highways- discretionary activity.		NZCPS Policy 23 (4) matters a) - d).	
S245.050	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to NZCPS Policy 23 (4) matters a) - d).	Amend rules R2-R13 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).
S245.051	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to NZCPS Policy 23 (4) matters a) - d).	Amend rules R2-R13 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).
S245.052	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to NZCPS Policy 23 (4) matters a) - d).	Amend rules R2-R13 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).
S245.053	8 Whaitua Te	Rule WH.R14: Wastewat	Amend	Considers rules for wastewater discharges into the coastal marine area need to give effect to NZCPS Policy 23 (1-3) matters.	Amend rules R14-R16 as appropriate to better give effect to NZCPS Policy 23(1-3) matters.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	er network catchment discharges - restricted discretionary activity.			
S245.054	8 Whaitua Te Whanganui-a-Tara	Rule WH.R15: Existing wastewater discharges from a treatment plant - discretionary activity.	Amend	Considers rules for wastewater discharges into the coastal marine area need to give effect to NZCPS Policy 23 (1-3) matters.	Amend rules R14-R16 as appropriate to better give effect to NZCPS Policy 23(1-3) matters.
S245.055	8 Whaitua Te Whanganui-a-Tara	Rule WH.R16: All other discharges of wastewater - non-complying activity.	Amend	Considers rules for wastewater discharges into the coastal marine area need to give effect to NZCPS Policy 23 (1-3) matters.	Amend rules R14-R16 as appropriate to better give effect to NZCPS Policy 23(1-3) matters.
S245.056	9 Te Awarua-o-Porirua Whaitua	Rule P.R1: Point source discharges of specific contaminants - prohibited activity.	Support	Considers rules for stormwater discharges into the coastal and marine area need to give effect to NZCPS Policy 23 (4) matters a) - d).	Retain rule 1 as notified.
S245.057	9 Te Awarua-	Rule P.R2: Stormwater to land -	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to	Amend rules R2-R12 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	permitted activity.		NZCPS Policy 23 (4) matters a) - d).	
S245.058	9 Te Awarua-o-Porirua Whaitua	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to NZCPS Policy 23 (4) matters a) - d).	Amend rules R2-R12 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).
S245.059	9 Te Awarua-o-Porirua Whaitua	Rule P.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to NZCPS Policy 23 (4) matters a) - d).	Amend rules R2-R12 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).
S245.060	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to NZCPS Policy 23 (4) matters a) - d).	Amend rules R2-R12 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).
S245.061	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to NZCPS Policy 23 (4) matters a) - d).	Amend rules R2-R12 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		impervious surfaces - controlled activity.			
S245.062	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas- controlled activity.	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to NZCPS Policy 23 (4) matters a) - d).	Amend rules R2-R12 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).
S245.063	9 Te Awarua-o-Porirua Whaitua	Rule P.R8: Stormwater from a local authority or state highway network- restricted discretionary activity.	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to NZCPS Policy 23 (4) matters a) - d).	Amend rules R2-R12 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).
S245.064	9 Te Awarua-o-Porirua Whaitua	Rule P.R9: Stormwater from new state highways- discretionary activity.	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to NZCPS Policy 23 (4) matters a) - d).	Amend rules R2-R12 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).
S245.065	9 Te Awarua-	Rule P.R10: Stormwate	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to	Amend rules R2-R12 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	r from new and redeveloped impervious surfaces-discretionary activity.		NZCPS Policy 23 (4) matters a) - d).	
S245.066	9 Te Awarua-o-Porirua Whaitua	Rule P.R11: All other stormwater discharges - non-complying activity.	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to NZCPS Policy 23 (4) matters a) - d).	Amend rules R2-R12 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).
S245.067	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Amend	Considers rules for stormwater discharges into the coastal and marine area need to give effect to NZCPS Policy 23 (4) matters a) - d).	Amend rules R2-R12 as appropriate to better give effect to NZCPS Policy 23(4) matters a) - d).
S245.068	9 Te Awarua-o-Porirua Whaitua	Rule P.R13: Wastewater network catchment discharges to water - restricted	Amend	Considers rules for wastewater discharges into the coastal marine area need to give effect to NZCPS Policy 23 (1-3) matters.	Amend rules R13-R15 as appropriate to better give effect to NZCPS Policy 23(1-3) matters.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discretionary activity.			
S245.069	9 Te Awarua-o-Porirua Whaitua	Rule P.R14: Existing wastewater discharges from a treatment plant to coastal and freshwater - discretionary activity.	Amend	Considers rules for wastewater discharges into the coastal marine area need to give effect to NZCPS Policy 23 (1-3) matters.	Amend rules R13-R15 as appropriate to better give effect to NZCPS Policy 23(1-3) matters.
S245.070	9 Te Awarua-o-Porirua Whaitua	Rule P.R15: All other discharges of wastewater - non-complying activity.	Amend	Considers rules for wastewater discharges into the coastal marine area need to give effect to NZCPS Policy 23 (1-3) matters.	Amend rules R13-R15 as appropriate to better give effect to NZCPS Policy 23(1-3) matters.
S245.071	6 Other methods	Method M36: Freshwater Action Plan programme.	Amend	Considers other statutory bodies such as Fish and Game and the Department of Conservation have a role in freshwater.	Requests the wording **Statutory bodies** be added to (a)
S245.072	6 Other methods	Method M40: Fish passage action plan programm	Amend	Requests the effectiveness of fish passage work be monitored and encourages the use of the Fish Passage Assessment tool and recent national guidance	Request a new Paragraph (d) and (e) be added. Wording proposed is as follows:**d) Monitoring of fish passage efforts for effectiveness** and **e) use national best practise fish passage assessment tools and guidance,** and

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		e for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.		Considers an explanation of the Freshwater Fisheries regulations (1983) will help understand how the regulations work vis-à-vis the regional plan provisions.	considers a footnote explaining the Freshwater Fish Regulations (1983) would be useful.
S245.073	12 Schedules	Schedule 27: Freshwater Action Plan requirements.	Amend	Considers fish passage as a component of Freshwater Action Plans could be reinforced	Requests more details on fish passage be added in the Attributes, Principles, and General Content sections.
S245.074	12 Schedules	Schedule 29: Stormwater Impact Assessments.	Amend	To give effect to Policy 23 (1) and (4) NZCPS	Requests a requirement to consider relevant matters from NZCPS 23 (1) and (4) in each of these schedules .
S245.075	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	To give effect to Policy 23 (1) and (4) NZCPS	Requests a requirement to consider relevant matters from NZCPS 23 (1) and (4) in each of these schedules .
S245.076	12 Schedules	Schedule 32: Wastewat	Amend	To give effect to Policy 23 (1) and (4) NZCPS	Requests a requirement to consider relevant matters from NZCPS 23 (1) and (4) in each of these schedules .

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		er Network Catchment Improvement Strategy.			
S245.077	5.1 Air quality rules	Rule R1: Outdoor burning - permitted activity.	Support	Considers this amendment protects the public from noxious, dangerous, offensive, and objectionable effects in the coastal marine area by applying the same level of protection that already exists on land.	Retain as notified
S245.078	5.1 Air quality rules	Rule R3: Outdoor burning for firefighter training - permitted activity.	Support	Considers this amendment protects the public from noxious, dangerous, offensive, and objectionable effects in the coastal marine area by applying the same level of protection that already exists on land.	Retain as notified
S245.079	5.1 Air quality rules	Rule R28: Cement storage - permitted activity.	Support	Considers this amendment protects the public from noxious, dangerous, offensive, and objectionable effects in the coastal marine area by applying the same level of protection that already exists on land.	Retain as notified
S245.080	5.1 Air quality rules	General conditions for the discharge of agrichemicals.	Support	Considers this amendment protects the public from noxious, dangerous, offensive, and objectionable effects in the coastal marine area by applying the same level of protection that already exists on land.	Retain as notified
S245.081	5.1 Air quality rules	Rule R7: Natural gas and liquefied petroleum gas - permitted activity.	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements enable the activity's location and effects on public access to be properly considered.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S245.082	5.1 Air quality rules	Rule R8: Diesel or kerosene blends - permitted activity.	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements enable the activity's location and effects on public access to be properly considered.	Retain as notified
S245.083	5.1 Air quality rules	Rule R9: Biogas - permitted activity.	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements enable the activity's location and effects on public access to be properly considered.	Retain as notified
S245.084	5.1 Air quality rules	Rule R10: Untreated wood - permitted activity.	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements enable the activity's location and effects on public access to be properly considered.	Retain as notified
S245.085	5.1 Air quality rules	Rule R11: Coal, light fuel oil, and petroleum distillates of higher viscosity - permitted activity.	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements enable the activity's location and effects on public access to be properly considered.	Retain as notified
S245.086	5.1 Air quality rules	Rule R14: Spray coating within an enclosed space -	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements enable the activity's location and effects on public access to be properly considered.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
S245.087	5.1 Air quality rules	Rule R15: Spray coating not within an enclosed space - permitted activity.	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements enable the activity's location and effects on public access to be properly considered.	Retain as notified
S245.088	5.1 Air quality rules	Rule R16: Printing processes - permitted activity.	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements enable the activity's location and effects on public access to be properly considered.	Retain as notified
S245.089	5.1 Air quality rules	Rule R17: Dry cleaning - permitted activity.	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements enable the activity's location and effects on public access to be properly considered.	Retain as notified
S245.090	5.1 Air quality rules	Rule R18: Fume cupboards - permitted activity.	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements enable the activity's location and effects on public access to be properly considered.	Retain as notified
S245.091	5.1 Air quality rules	Rule R19: Workplace ventilation - permitted activity.	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				enable the activity's location and effects on public access to be properly considered.	
S245.092	5.1 Air quality rules	Rule R20: Mechanical processing of metals - permitted activity.	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements enable the activity's location and effects on public access to be properly considered.	Retain as notified
S245.093	5.1 Air quality rules	Rule R21: Thermal metal spraying - permitted activity.	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements enable the activity's location and effects on public access to be properly considered.	Retain as notified
S245.094	5.1 Air quality rules	Rule R25: Abrasive blasting within an enclosed booth - permitted activity.	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements enable the activity's location and effects on public access to be properly considered.	Retain as notified
S245.095	5.1 Air quality rules	Rule R26: Abrasive blasting outside an enclosed area - permitted activity.	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements enable the activity's location and effects on public access to be properly considered.	Retain as notified
S245.096	5.1 Air quality rules	Rule R27: Handling of bulk solid materials -	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.		enable the activity's location and effects on public access to be properly considered.	
S245.097	5.1 Air quality rules	Rule R29: Alcoholic beverage production - permitted activity.	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements enable the activity's location and effects on public access to be properly considered.	Retain as notified
S245.098	5.1 Air quality rules	Rule R30: Coffee roasting - permitted activity.	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements enable the activity's location and effects on public access to be properly considered.	Retain as notified
S245.099	5.1 Air quality rules	Rule R31: Food, animal or plant matter manufacturing and processing - permitted activity.	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements enable the activity's location and effects on public access to be properly considered.	Retain as notified
S245.100	5.1 Air quality rules	Rule R34: Mobile source emissions - permitted activity.	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements enable the activity's location and effects on public access to be properly considered.	Retain as notified
S245.101	5.1 Air quality rules	Rule R35: Water and wastewater processes	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		- permitted activity.		enable the activity's location and effects on public access to be properly considered.	
S245.102	5.1 Air quality rules	Rule R36: Drying and heating of minerals - permitted activity.	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements enable the activity's location and effects on public access to be properly considered.	Retain as notified
S245.103	5.1 Air quality rules	Rule R37: Handheld discharge of agrichemicals - permitted activity.	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements enable the activity's location and effects on public access to be properly considered.	Retain as notified
S245.104	5.1 Air quality rules	Rule R38: Motorised and aerial discharge of agrichemicals - permitted activity.	Support	Considers there to be no functional need for this activity to occur in the coastal marine area. Considers the amendment gives effect to the NZCPS Policy 6(2) as the consent requirements enable the activity's location and effects on public access to be properly considered.	Retain as notified
S245.105	5.1 Air quality rules	Rule R27: Handling of bulk solid materials - permitted activity.	Neutral	Considers this permitted activity rule should not have general application to the coastal marine area. Considers it may be appropriate to apply it to the coastal marine area within the Commercial Port Area, consistent with NZCPS Policy 9 (Ports).	Consider whether it is necessary for this rule to apply to the coastal marine area within the Commercial Port Area only.
S245.106	5.1 Air quality rules	Rule R33: Petroleum storage or transfer facilities -	Amend	Supports the proposed amendments to condition (a) as it is ineffective to rely on a property boundary as the point beyond which effects of permitted activities are controlled.	Amend condition (b) wording as follows: (b) there is no emission of hazardous air pollutants as identified in Schedule L2 (air pollutants) beyond the boundary of the property **or in the coastal marine area** that

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.		Considers a similar amendment is required for condition (b) as concerned that the effects on human health and ecosystems from these pollutants is uncontrolled.	does, or is likely to, cause adverse effects on human health, ecosystems, or property.

S286 Taranaki Whānui

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S286.001	General comments	General comments - definitions	Amend	Considers consequential changes may be required to provide for the relief sought by Taranaki Whānui for other provisions.	Amend definitions as necessary to provide for the relief sought by submitter.
S286.002	General comments	General comments - definitions	Not Stated	Seeks a definition of papakāinga is required as consequential amendment to provide for relief sought in relation to enabling papakāinga activities.	Add definition for Papakāinga:**Any activity undertaken in the traditional rohe of tangata whenua to sustain themselves, which is on land held under Te Ture Whenua Māori Act 1993, or on land where there is an ancestral connection to the land and the land will remain in Māori ownership in the long term. Papakāinga includes residential activities and commercial activities that provide employment and / or income to support those living in the papakāinga as well as (but not be limited to): social, cultural, economic, conservation and recreation activities, marae, wāhi tapu and urupā.**
S286.003	General comments	General comments - target attribute states	Not Stated	Supports targets and timeframes with respect to contaminants, but notes significant infrastructure investment is required by 2040 to meet the E.coli target. Concerned that this target will not be achievable with current funding mechanisms. Considers there is a need to prioritise and progress a programme of new streams of funding not reliant on existing ratepayer base.	Not stated
S286.004	General comments	General comments - unplanned greenfield	Not Stated	Concerns unplanned greenfield areas and associated provisions will impose significant costs and impact ability of Taranaki Whānui whānau to develop ancestral lands. Notes land not yet returned to Māori ownership through treaty settlements,	Freshwater effects of development of these sites are addressed through a regional consent process rather than a regional plan change

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		development		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.	
S286.005	General comments	General comments - overall	Not Stated	Concerned additional rules for stormwater management would create additional barriers to develop land for long-term benefit of Taranaki Whānui uri through Papakāinga.	Not stated
S286.006	General comments	General comments - overall	Not Stated	Notes the huanga of mahinga kai in Schedule B has not been updated following the Whaitua process and publication of Te Mahere Wai o Te Kāhui Taiao.	Seeks amendment of Schedule B in consultation with mana whenua to fully reflect mahinga kai values and outcomes, including those expressed in Te Mahere Wai o Te Kāhui Taiao
S286.007	2 Interpretation	Hydrological control	Amend	Considers definition does not provide assistance in implementation of associated rules as it does not outline examples of what hydrological controls are acceptable. Considers there is no guidance on what compliant hydrological controls would look like, and is an issue considering it is required for all new impervious surfaces over 30sqm.	Amend definition to improve clarity.
S286.008	2 Interpretation	Impervious surfaces	Amend	Concerned definition is linked to rules that would impose significant costs on the development of papakāinga. Concerned this will make it hard to develop land for the long-term benefit of Taranaki Whānui whanau.	Amend definition as follows: Surfaces that prevent or significantly impede the infiltration of stormwater into soil or the ground, includes: -roofs -paved areas (including sealed/compacted metal) such as roads, driveways, parking areas, sidewalks/foot paths or patios, and excludes: -grassed areas, gardens and other vegetated areas -porous or permeable paving -slated decks which allow water to drain through to a permeable surface -porous or permeable paving and living roofs -roof areas with rainwater collection and reuse -any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)**-papakāinga**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S286.009	2 Interpretation	Unplanned greenfield development	Amend	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.	Amend definition as follows: Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 **and excludes:** **-land either currently owned by mana whenua, or identified for potential future ownership through a right of first refusal or deferred selection process through Treaty Settlements.** ~~which also require an underlying zone change (from rural/nonurban/ open space to urban) though a District Plan change to enable the development. Note: Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023.~~ Freshwater effects of development of these sites are addressed through a regional consent process rather than a regional plan change
S286.010	6 Other methods	Method M36: Freshwater Action Plan programme.	Support	Supports action plans to achieve objectives	Retain as notified.
S286.011	6 Other methods	Method M37: Freshwater Action Plan for the Parangarahu Lakes.	Support	Supports action plans to achieve Parangarahu Lakes objectives	Retain as notified.
S286.012	6 Other methods	Method 39: Freshwater Action	Support	Supports development of a Freshwater Action Plan for nationally threatened freshwater species.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.			
S286.013	6 Other methods	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Support	Supports identification and remediation of barriers to fish passage.	Retain as notified.
S286.014	6 Other methods	Method M41: Identifying and responding to degradation in freshwater	Support	Supports monitoring and addressing causes of any degradation of freshwater bodies.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.			
S286.015	6 Other methods	Method M43: Supporting the health of urban waterbodies.	Amend	Supports in principle, but notes this method is not timebound unlike action plans.	Amend method to include timeframes.
S286.016	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Amend	Supports in principle, but notes this method is not timebound unlike action plans.	Amend method to include timeframes.
S286.017	6 Other methods	Method M45: Funding of wastewater and stormwater network upgrades	Amend	Supports in principle, but notes this method is not timebound unlike action plans. Seeks method as a priority as E.coli targets cannot be met without new and significant sources of infrastructure funding.	Amend method to include timeframes.
S286.018	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies	Amend	Supports full restoration of Te-Whanganui-a-Tara's waterways to wai ora. Considers it is unclear if text from "Note..." forms part of objective or it is some form of advisory note. Seeks word "note" should be deleted as bullet points are an important part of the objective. Mana	Amend objective as follows: Objective WH.O1 The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.		whenua seek customary practices can be undertaken throughout catchment rather than just as a designated range of locations. Otherwise, the objective could be achieved without doing anything as customary practices can take place already at a range of places.	~~Note~~ In the wai ora state: • Āhua (natural character) is restored and freshwater bodies exhibit their natural quality, rhythms, range of flows, form, hydrology and character • All freshwater bodies have planted margins • All freshwater bodies and coastal waters have healthy functioning ecosystems and their water conditions and habitat support the presence, abundance, survival and recovery of At-risk and Threatened species and taonga species • Mahinga kai and kaimoana species are healthy, plentiful enough for long term harvest and are safe to harvest and eat or use, including for manuhiri and to exercise manaakitanga • Mana whenua are able to undertake customary practices~~at a range of places~~ throughout the catchment.
S286.019	8 Whaitua Te Whanganui-a-Tara	Objective WH.O2: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement	Amend	Supports full restoration of Te-Whanganui-a-Tara's waterways towards wai ora by 2040. However, the huanga of mahinga kai in Schedule B have not been updated following Whaitua process and publication of Te Mahere Wai o Te Kāhui Taiao.	Retain objective and amend Schedule B in consultation with mana whenua to fully reflect mahinga kai values and outcomes, including those expressed in Te Mahere Wai o Te Kāhui Taiao.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		towards wai ora.			
S286.020	8 Whaitua Te Whanganui-a-Tara	Objective WH.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved to achieve the coastal water objectives set out in Table 8.1.	Amend	Supports full restoration of Te-Whanganui-a-Tara's waterways towards wai ora by 2040 but notes significant infrastructure investment is required by 2040 to meet the E.coli target. Submitter is concerned this target will not be achievable with current funding mechanisms. Considers it should be a priority to find new streams of funding that are not reliant on the existing ratepayer base and regular monitoring and reporting on progress towards the target is completed.	Retain objective provided: -Method M45 is implemented as a priority and new infrastructure funding mechanisms are put in place; and -regular monitoring and reporting is undertaken on progress towards the target.
S286.021	8 Whaitua Te Whanganui-a-Tara	Table 8.1 Coastal water objectives.	Amend	Supports full restoration of Te-Whanganui-a-Tara's waterways towards wai ora by 2040 but notes significant infrastructure investment is required by 2040 to meet the E.coli target. Submitter is concerned this target will not be achievable with current funding mechanisms. Considers it should be a priority to find new streams of funding that are not reliant on the existing ratepayer base and regular monitoring and reporting on progress towards the target is completed.	Retain objective provided: -Method M45 is implemented as a priority and new infrastructure funding mechanisms are put in place; and -regular monitoring and reporting is undertaken on progress towards the target.
S286.022	8 Whaitua Te	Objective WH.O4: The	Support	Support in principle.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status.			
S286.023	8 Whaitua Te Whanganui-a-Tara	Objective WH.O5: By 2040 the health and wellbeing of the Parangarahu Lakes and associated	Support	Support in principle.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		natural wetlands are on a trajectory of improvement towards wai ora.			
S286.024	8 Whaitua Te Whanganui-a-Tara	Table 8.2 Target attribute states for lakes.	Support	Support in principle.	Retain as notified.
S286.025	8 Whaitua Te Whanganui-a-Tara	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	Support	Support in principle.	Retain as notified.
S286.026	8 Whaitua Te Whanganui-a-Tara	Objective WH.O7: The physical integrity of aquitards is protected so that confined aquifer pressures are	Support	Support in principle.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		maintained.			
S286.027	8 Whaitua Te Whanganui-a-Tara	Objective WH.O8: Primary contact sites within Te Awa Kairangi/Hutt River, Pākuratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact.	Amend	Supports full restoration of Te-Whanganui-a-Tara's waterways towards wai ora by 2040 but notes significant infrastructure investment is required by 2040 to meet the E.coli target. Submitter is concerned this target will not be achievable with current funding mechanisms. Considers it should be a priority to find new streams of funding that are not reliant on the existing ratepayer base and regular monitoring and reporting on progress towards the target is completed.	Retain objective provided: -Method M45 is implemented as a priority and new infrastructure funding mechanisms are put in place; and -regular monitoring and reporting is undertaken on progress towards the target.
S286.028	8 Whaitua Te Whanganui-a-Tara	Table 8.3 Primary contact site objectives in rivers.	Amend	Supports full restoration of Te-Whanganui-a-Tara's waterways towards wai ora by 2040 but notes significant infrastructure investment is required by 2040 to meet the E.coli target. Submitter is concerned this target will not be achievable with current funding mechanisms. Considers it should be a priority to find new streams of funding that are not reliant on the existing ratepayer base and regular monitoring and reporting on progress towards the target is completed.	Retain objective provided: -Method M45 is implemented as a priority and new infrastructure funding mechanisms are put in place; and -regular monitoring and reporting is undertaken on progress towards the target.
S286.029	8 Whaitua Te Whanganui-a-Tara	Objective WH.O9: Water quality, habitats, water quantity	Support	Support in principle.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and ecological processes of rivers are maintained or improved.			
S286.030	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Amend	Supports full restoration of Te-Whanganui-a-Tara's waterways towards wai ora by 2040 but notes significant infrastructure investment is required by 2040 to meet the E.coli target. Submitter is concerned this target will not be achievable with current funding mechanisms. Considers it should be a priority to find new streams of funding that are not reliant on the existing ratepayer base and regular monitoring and reporting on progress towards the target is completed.	Retain objective provided: -Method M45 is implemented as a priority and new infrastructure funding mechanisms are put in place; and -regular monitoring and reporting is undertaken on progress towards the target.
S286.031	8 Whaitua Te Whanganui-a-Tara	Policy WH.P1: Improvement of aquatic ecosystem health.	Support	Supports progressive reduction of contaminants and restoration of habitats.	Retain as notified.
S286.032	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	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	Amend policy: Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives. Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (a) ~~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

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				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.	contaminants, and (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.
S286.033	8 Whaitua Te Whanganui-a-Tara	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Support	Support in principle.	Retain as notified.
S286.034	8 Whaitua Te Whanganui-a-Tara	Policy WH.P4: Achievement of the visual clarity target attribute states.	Support	Support in principle.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S286.035	8 Whaitua Te Whanganui-a-Tara	Table 8.5: Sediment load reductions required to achieve the visual clarity target attribute states.	Support	Support in principle.	Retain as notified.
S286.036	8 Whaitua Te Whanganui-a-Tara	Policy WH.P5: Localised adverse effects of point source discharge.	Support	Support in principle.	Retain as notified.
S286.037	8 Whaitua Te Whanganui-a-Tara	Policy WH.P6: Cumulative adverse effects of point source discharges.	Support	Support in principle.	Retain as notified.
S286.038	8 Whaitua Te Whanganui-a-Tara	Policy WH.P7: Discharges to groundwater.	Support	Support in principle.	Retain as notified.
S286.039	8 Whaitua Te Whanganui-a-Tara	Policy WH.P8: Avoiding discharges	Support	Support in principle.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		of specific products and waste.			
S286.040	8 Whaitua Te Whanganui-a-Tara	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Support	Support in principle.	Retain as notified.
S286.041	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	Amend	Supports management of stormwater discharges through hydrological control and water sensitive urban design measures. Supports recognition of catchment-scale communal schemes which may be more efficient than numerous small systems on individual sites. Considers PC1 does not contain sufficient direction on how measures will be implemented and does not set out what would be considered an acceptable solution to comply. Considers if technical specifications were included, it would mean that smaller developments could rely on these without having to develop expensive bespoke solutions on site by-site basis.	Develop a more comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions.
S286.042	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk	Support	Support in principle.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		industrial or trade premises.			
S286.043	8 Whaitua Te Whanganui-a-Tara	Policy WH.P12: Managing stormwater from a port or airport.	Amend	Support in principle, but considers policy could be reworded to strengthen mana whenua values and to be consistent with wording of other policies.	Amend policy: Policy WH.P12: Managing stormwater from a port or airport ~~The adverse effects, including on aquatic ecosystem health and mahinga kai, contact recreation and Māori customary use, of t~~ **T**he discharge of stormwater from a port, or airport, where the discharge will enter water, including via a local authority or state highway stormwater network, shall be avoided or minimised by: (a) identifying priorities for improvement, including methods and timeframes for improvement, and (b) having particular regard to protecting sites with identified significant or outstanding values, and (c) implementing good management practice including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and (d) where required to reduce localised adverse effects, or to meet the target attribute states and coastal water objectives, progressively improving discharge quality over time.**(e) prioritising the reduction, removal, and/or treatment of stormwater discharges to Schedule C (mana whenua) sites, or mahinga kai sites.**
S286.044	8 Whaitua Te Whanganui-a-Tara	Policy WH.P13: Managing stormwater network discharges through a Stormwater Managem	Amend	Supports use of stormwater management strategies to achieve freshwater outcomes, particularly the prioritisation of outcomes with regard to Schedule C (mana whenua) sites or mahinga kai.	Amend policy: Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy Stormwater discharges from local authority and state highway networks shall be managed by: (a) reducing the copper and zinc loads in discharges to coastal water management units to contribute to meeting the coastal water objectives to maintain or improve, and

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		ent Strategy.			(b) reducing the concentration and contaminant loads of copper and zinc from discharges to surface water bodies in order to maintain, and in degraded part Freshwater Management Units improve, the water quality state for dissolved copper and zinc to contribute to meeting the target attribute states in those part Freshwater Management Units, and (c) ~~supporting the achievement of any~~ **reducing contaminant loads to achieve** other relevant target attribute states or coastal water objectives including for ecosystem health, nutrients, visual clarity and Escherichia coli or enterococci, and (d) implementing a stormwater management strategy and stormwater management plans prepared in accordance with the information and requirements set out in Schedule 31 (stormwater strategy - whaitua), and (e) monitoring and modelling the stormwater network to identify catchments to be prioritised, the copper and zinc concentrations and loads in the discharge, and changes in discharge volume and quality over time following improvements in the network infrastructure, and (f) prioritising the reduction, removal, and/or treatment of stormwater discharges to Schedule A (outstanding water bodies) or Schedule C (mana whenua) sites, or mahinga kai **sites.**
S286.045	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Supports management of stormwater discharges through hydrological control and water sensitive urban design measures. Supports recognition of catchment-scale communal schemes which may be more efficient than numerous small systems on individual sites. Considers PC1 does not contain sufficient direction on how measures will be implemented and does not set out what would be considered an acceptable solution to comply. Considers if technical specifications were included, it would mean that smaller developments could rely	Develop a more comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				on these without having to develop expensive bespoke solutions on site by-site basis.	
S286.046	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Support	Support in principle.	Retain as notified.
S286.047	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Oppose	Concerned policy and provisions will impose significant costs and impact the ability of Taranaki Whānui whanau to develop their ancestral lands. Notes land not yet returned to Māori ownership through treaty settlements, includes many sites in areas mapped as "unplanned greenfield land" including rural and open space land. Considers prohibition on developing these lands inconsistent with principles of Te Tiriti and inconsistent with need to provide for broader housing affordability and innovation on both Māori and all other land. Considers planning processes need to be flexible to ensure aspirational outcomes are achieved. Seeks freshwater effects of development of these sites are addressed through a regional consent process rather than a regional plan change. Considers policy a duplicate of WH.P2(a) and unnecessary.	Delete policy: ~~Policy WH.P16: Stormwater discharges from new unplanned greenfield development Avoid all new stormwater discharges from unplanned greenfield development where the discharge will enter a surface water body or coastal water, including through an existing local authority stormwater network.~~
S286.048	8 Whaitua Te Whanganui-a-Tara	Policy WH.P17: General wastewater policy to achieve	Amend	Supports full restoration of Te-Whanganui-a-Tara's waterways towards wai ora by 2040 but notes significant infrastructure investment is required by 2040 to meet the E.coli target. Submitter is concerned this target will not be achievable with current funding mechanisms. Considers it should be	Retain policy provided: -Method M45 is implemented as a priority and new infrastructure funding mechanisms are put in place; and -regular monitoring and reporting is undertaken on progress towards the target.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		target attribute states and coastal objectives.		a priority to find new streams of funding that are not reliant on the existing ratepayer base and regular monitoring and reporting on progress towards the target is completed.	
S286.049	8 Whaitua Te Whanganui-a-Tara	Policy WH.P18: Progressing works to meet Escherichia coli target attribute states.	Amend	Supports full restoration of Te-Whanganui-a-Tara's waterways towards wai ora by 2040 but notes significant infrastructure investment is required by 2040 to meet the E.coli target. Submitter is concerned this target will not be achievable with current funding mechanisms. Considers it should be a priority to find new streams of funding that are not reliant on the existing ratepayer base and regular monitoring and reporting on progress towards the target is completed.	Retain policy provided: -Method M45 is implemented as a priority and new infrastructure funding mechanisms are put in place; and -regular monitoring and reporting is undertaken on progress towards the target.
S286.050	8 Whaitua Te Whanganui-a-Tara	Policy WH.P19: Managing wastewater network catchment discharges.	Amend	Supports full restoration of Te-Whanganui-a-Tara's waterways towards wai ora by 2040 but notes significant infrastructure investment is required by 2040 to meet the E.coli target. Submitter is concerned this target will not be achievable with current funding mechanisms. Considers it should be a priority to find new streams of funding that are not reliant on the existing ratepayer base and regular monitoring and reporting on progress towards the target is completed.	Retain policy provided: -Method M45 is implemented as a priority and new infrastructure funding mechanisms are put in place; and -regular monitoring and reporting is undertaken on progress towards the target.
S286.051	8 Whaitua Te Whanganui-a-Tara	Policy WH.P20: Managing existing wastewater treatment plant discharges.	Amend	Supports full restoration of Te-Whanganui-a-Tara's waterways towards wai ora by 2040 but notes significant infrastructure investment is required by 2040 to meet the E.coli target. Submitter is concerned this target will not be achievable with current funding mechanisms. Considers it should be a priority to find new streams of funding that are not reliant on the existing ratepayer base and regular monitoring and reporting on progress towards the target is completed.	Retain policy provided: -Method M45 is implemented as a priority and new infrastructure funding mechanisms are put in place; and -regular monitoring and reporting is undertaken on progress towards the target.
S286.052	8 Whaitua Te	Policy WH.P21: Managing	Amend	Supports reducing diffuse discharges from farming activities, but notes clause (a) just refers to other policies and can be deleted.	Amend policy. Policy WH.P21: Managing diffuse discharges of nutrients

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	Whanganui-a-Tara	diffuse discharges of nutrients and Escherichia coli from farming activities.			and Escherichia coli from farming activities. Reduction in diffuse discharges of nutrients and Escherichia coli from farming activities shall be achieved by: ~~(a) capping, minimising and reducing diffuse discharges from individual rural properties in accordance with WH.P22, WH.P23 and WH.P24, and~~ (b) applying target attributes states as limits on rural land use change and intensification, and (c) progressively establishing and maintaining woody vegetation on highest erosion risk land as a limit on land use in accordance with WH.P28, and (d) excluding stock from water bodies as a limit on land use in accordance with Policy WH.P26, and (e) supporting good management practice.
S286.053	8 Whaitua Te Whanganui-a-Tara	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Support	Support in principle.	Retain as notified.
S286.054	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high	Amend	Supports in principle, but notes planting of indigenous species should be encouraged where possible.	Amend policy as follows: Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion Reduce discharges of sediment from farming activities on high erosion risk land and highest erosion risk land by: (a) identifying highest erosion risk land (pasture) and high erosion risk land (pasture), and (b) requiring that farm environment plans prepared for farms with highest erosion risk land (pasture) and/or high erosion

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		risk of erosion.			risk land (pasture) include an erosion risk treatment plan, and (c) ensuring erosion risk treatment plans: (i) deliver permanent woody vegetation cover on at least 50% of highest risk erosion land (pasture) that is in pasture on a farm within 10 years and appropriate erosion control treatment for the remaining highest risk erosion land (pasture) and high erosion risk land (pasture) that is in pasture on the farm, and (ii) identify and respond to risks of sediment loss on high erosion risk land (pasture) associated with grazing livestock, earthworks or vegetation clearance, by using effective erosion control treatment, and**(iii) encouraging planting of indigenous species where these can provide suitable stabilisation for erosion prone land, and** (d) Wellington Regional Council providing support to landowners to implement erosion risk treatment plans.
S286.055	8 Whaitua Te Whanganui-a-Tara	Policy WH.P24: Phasing of farm environment plans.	Support	Support in principle.	Retain as notified.
S286.056	8 Whaitua Te Whanganui-a-Tara	Policy WH.P25: Managing rural land use change.	Support	Support in principle.	Retain as notified.
S286.057	8 Whaitua Te Whanganui-a-Tara	Policy WH.P26: Managing livestock access to small rivers.	Support	Support in principle.	Retain as notified.
S286.058	8 Whaitua Te	Policy WH.P27:	Support	Support in principle.	Retain as notified.

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	Whanganui-a-Tara	Promoting stream shading.			
S286.059	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Support	Support in principle.	Retain as notified.
S286.060	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Support	Support in principle.	Retain as notified.
S286.061	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Support	Support in principle.	Retain as notified.
S286.062	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Amend	Supports intent to avoid winter earthworks, but considers this issue can be addressed through consent conditions on an earthworks consent rather than requiring a separate consent.	Delete policy: ~~Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall:~~ ~~(a) be shut down from 1st June to 30th September each year, and~~ ~~(b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).~~

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S286.063	8 Whaitua Te Whanganui-a-Tara	Policy WH.P32: Minimum flows and minimum water levels in Whaitua Te Whanganui-a-Tara.	Support	Support in principle.	Retain as notified.
S286.064	8 Whaitua Te Whanganui-a-Tara	Policy WH.P33: Core allocation in Whaitua Te Whanganui-a-Tara.	Support	Support in principle.	Retain as notified.
S286.065	8 Whaitua Te Whanganui-a-Tara	Rule WH.R1: Point source discharges of specific contaminants - prohibited activity.	Support	Support in principle.	Retain as notified.
S286.066	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Amend	Supports in principle, but notes territorial authorities control new connections to discharge to the network. Considers as written, rule requires all new connections to the stormwater network to obtain a regional resource consent and should be reworded.	Consolidate WH.R2 and WH.R3 into one rule, or amend as follows: Rule WH.R2: Stormwater to land - permitted activity. The discharge of stormwater onto or into land, including where contaminants may enter groundwater: (a) that is not from a high risk industrial or trade premise, or (b) **that is not connected to** ~~that does not discharge from,~~

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					~~or to,~~ a local authority stormwater network, is a permitted activity provided the following conditions are met: (...)
S286.067	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Amend	Supports in principle, but notes territorial authorities control new connections to discharge to the network. Considers as written, rule requires all new connections to the stormwater network to obtain a regional resource consent and should be reworded.	Consolidate WH.R2 and WH.R3 into one rule, or amend as follows: Rule WH.R2: Stormwater to land - permitted activity. The discharge of stormwater onto or into land, including where contaminants may enter groundwater: (a) that is not from a high risk industrial or trade premise, or (b) **that is not connected to** ~~that does not discharge from, or to,~~ a local authority stormwater network, is a permitted activity provided the following conditions are met: (...)
S286.068	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Support	Support in principle.	Retain as notified.
S286.069	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Supports management of stormwater discharges through hydrological control and water sensitive urban design measures. Supports recognition within policy of catchment-scale communal schemes which may be more efficient than numerous small systems on individual sites. Notes PC1 does not contain sufficient direction on how measures will be implemented and does not set out what would be considered an acceptable solution to comply.	Develop a more comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions. Exclude papakāinga development from rule.

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				Considers if technical specifications were included, it would mean that smaller developments could rely on these without having to develop expensive bespoke solutions on site by-site basis. Considers rule would impose significant costs on the development of papakāinga. Concerned this will make it hard to develop land for the long-term benefit of Taranaki Whānui whanau.	
S286.070	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Supports management of stormwater discharges through hydrological control and water sensitive urban design measures. Supports recognition within policy of catchment-scale communal schemes which may be more efficient than numerous small systems on individual sites. Notes PC1 does not contain sufficient direction on how measures will be implemented and does not set out what would be considered an acceptable solution to comply. Considers if technical specifications were included, it would mean that smaller developments could rely on these without having to develop expensive bespoke solutions on site by-site basis. Considers rule would impose significant costs on the development of papakāinga. Concerned this will make it hard to develop land for the long-term benefit of Taranaki Whānui whanau.	Develop a more comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions. Exclude papakāinga development from rule.
S286.071	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised	Amend	Supports management of stormwater discharges through hydrological control and water sensitive urban design measures. Supports recognition within policy of catchment-scale communal schemes which may be more efficient than numerous small systems on individual sites. Notes PC1 does not contain sufficient direction on how measures will be implemented and does not set out what would be considered an acceptable solution to comply.	Develop a more comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions. Exclude papakāinga development from rule.

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		areas - controlled activity.		Considers if technical specifications were included, it would mean that smaller developments could rely on these without having to develop expensive bespoke solutions on site by-site basis. Considers rule would impose significant costs on the development of papakāinga. Concerned this will make it hard to develop land for the long-term benefit of Taranaki Whānui whanau.	
S286.072	8 Whaitua Te Whanganui-a-Tara	Rule WH.R8: Stormwater from a port or airport - restricted discretionary activity.	Amend	Supports in principle, and supports mahinga kai, Māori customary use and effects on Schedule C (mana whenua) sites being matters of discretion. Notes it is unclear if mahinga kai sites and Māori customary use solely refers to sites listed in schedules B and H respectively. Notes this is inconsistent throughout PC1 and references WH.R8 as an example which specifically refers to Schedule H for Māori customary use.	Amend rule to improve clarity.
S286.073	8 Whaitua Te Whanganui-a-Tara	Rule WH.R9: Stormwater from a local authority or state highway network- restricted discretionary activity.	Amend	Supports in principle, but consider effects on mahinga kai should be matters of discretion as proposed for WH.R8. Considers Schedule B needs to be updated based on Te Mahere Wai o Te Kāhui Taiao so it covers full range of mahinga kai values, and schedule needs to be consistently referenced as a matter of discretion in rules.	Amend rule to include effects on mahinga kai as a matter of discretion and amend Schedule B in consultation with mana whenua to fully reflect mahinga kai values and outcomes, including those expressed in Te Mahere Wai o Te Kāhui Taiao.
S286.074	8 Whaitua Te Whanganui-a-Tara	Rule WH.R10: Stormwater from new state highways- discretionary activity.	Support	Support in principle.	Retain as notified.

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S286.075	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Support	Support in principle.	Retain as notified.
S286.076	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Amend	Supports in principle, but seeks deletion of reference to WH.R13 for reasons provided below: 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.	Amend rule: Rule WH.R12: All other stormwater discharges - noncomplying activity The: (a) discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule WH.R2, or (b) discharge of stormwater into water or onto or into land where it may enter a surface water body or coastal water, that is not permitted by Rule WH.R3, or a restricted discretionary activity under Rules WH.R8 or WH.R9, or (c) discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule WH.R4, or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade premise that does not meet the conditions of Rule WH.R11, or (d) use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater into water or onto or into land where it may enter water, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or WH.R7, or a discretionary activity under Rule WH.R10 or WH.R11, ~~or a prohibited activity under WH.R13,~~ is a noncomplying activity.

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S286.077	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerned policy and provisions will impose significant costs and impact the ability of Taranaki Whānui whanau to develop their ancestral lands. Notes land not yet returned to Māori ownership through treaty settlements, includes many sites in areas mapped as "unplanned greenfield land" including rural and open space land. Considers prohibition on developing these lands inconsistent with principles of Te Tiriti and inconsistent with need to provide for broader housing affordability and innovation on both Māori and all other land. Considers planning processes need to be flexible to ensure aspirational outcomes are achieved. Seeks freshwater effects of development of these sites are addressed through a regional consent process rather than a regional plan change.	Delete rule.
S286.078	8 Whaitua Te Whanganui-a-Tara	Rule WH.R14: Wastewater network catchment discharges - restricted discretionary activity.	Amend	Considers Schedule B needs to be updated based on Te Mahere Wai o Te Kāhui Taiao so it covers full range of mahinga kai values, and schedule needs to be consistently referenced as a matter of discretion in rules. Notes it is unclear why mahinga kai is listed a separate item, and if Schedule B was complete this would not be necessary.	Review matters of discretion with regards to Māori values.
S286.079	8 Whaitua Te Whanganui-a-Tara	Rule WH.R15: Existing wastewater discharges from a treatment plant - discretionary activity.	Amend	Considers Schedule B needs to be updated based on Te Mahere Wai o Te Kāhui Taiao so it covers full range of mahinga kai values, and schedule needs to be consistently referenced as a matter of discretion in rules.	Amend Schedule B in consultation with mana whenua to fully reflect mahinga kai values and outcomes, including those expressed in Te Mahere Wai o Te Kāhui Taiao.
S286.080	8 Whaitua Te	Rule WH.R16:	Support	Support in principle.	Retain as notified.

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	Whanganui-a-Tara	All other discharges of wastewater - non-complying activity.			
S286.081	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity.	Support	Support in principle.	Retain as notified.
S286.082	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land - controlled activity.	Support	Support in principle.	Retain as notified.
S286.083	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance - discretionary activity.	Support	Support in principle.	Retain as notified.
S286.084	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Support	Support in principle.	Retain as notified.

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S286.085	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry - discretionary activity.	Support	Support in principle.	Retain as notified.
S286.086	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.	Support	Support in principle.	Retain as notified.
S286.087	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Not Stated	Support in principle.	Retain as notified.
S286.088	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Not Stated	Supports intent to avoid winter earthworks, but notes this issue can be addressed through consent conditions in earthworks consents rather than requiring separate consents. Notes the winter shut down period is a matter of discretion under rule WH.R24 and therefore does not make sense to escalate to a non-complying activity under WH.R25.	Amend rule as follows: Rule WH.R24: Earthworks - restricted discretionary activity. Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~
S286.089	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Support	Support in principle	Retain as notified.
S286.090	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Support	Support in principle	Retain as notified.
S286.091	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Support	Support in principle	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S286.092	8 Whaitua Te Whanganui-a-Tara	Table 8.6: Phase-in of farm environment plans for part Freshwater Management Units.	Support	Support in principle	Retain as notified.
S286.093	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Support	Support in principle	Retain as notified.
S286.094	8 Whaitua Te Whanganui-a-Tara	Rule WH.R29: Livestock access to a small river - discretionary activity.	Support	Support in principle	Retain as notified.
S286.095	8 Whaitua Te Whanganui-a-Tara	Rule WH.R30: The use of land for farming activities - discretionary activity.	Support	Support in principle	Retain as notified.
S286.096	8 Whaitua Te Whanganui-a-Tara	Rule WH.R31: Change of rural land	Support	Support in principle	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		use - discretionary activity.			
S286.097	8 Whaitua Te Whanganui-a-Tara	Rule WH.R32: Farming activities - non-complying activity.	Support	Support in principle	Retain as notified.
S286.098	8 Whaitua Te Whanganui-a-Tara	Rule WH.R33: Take and use of water in the Whaitua Te Whanganui-a Tara - restricted discretionary activity.	Support	Support in principle	Retain as notified.
S286.099	8 Whaitua Te Whanganui-a-Tara	Rule WH.R34: Take and use of water in the Whaitua Te Whanganui-a-Tara - discretionary activity.	Support	Support in principle	Retain as notified.
S286.100	8 Whaitua Te	Rule WH.R35: Take and	Support	Support in principle	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	use of water from outstanding rivers or lakes - non-complying activity.			
S286.101	8 Whaitua Te Whanganui-a-Tara	Rule WH.R36: Take and use of water exceeding minimum flows or core allocation - prohibited activity.	Support	Support in principle	Retain as notified.
S286.102	8 Whaitua Te Whanganui-a-Tara	Table 8.7: Minimum flows for rivers in the Whaitua Te Whanganui-a-Tara.	Support	Support in principle	Retain as notified.
S286.103	8 Whaitua Te Whanganui-a-Tara	Table 8.8: Surface water allocation amounts for rivers and Category A	Support	Support in principle	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		groundwater and Category B groundwater in the Te Awa Kairangi/Hutt River, Wainuiomata River and Ōrongorongo River catchments.			
S286.104	8 Whaitua Te Whanganui-a-Tara	Table 8.9: Groundwater allocation amounts for Category B groundwater and Category C groundwater in the Whaitua Te Whanganui-a-Tara.	Support	Support in principle	Retain as notified.
S286.105	8 Whaitua Te Whanganui-a-Tara	Figure 8.1: Te Awa Kairangi / Hutt River	Support	Support in principle	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and Upper Hutt groundwater in Tables 8.8 and 8.9.			
S286.106	8 Whaitua Te Whanganui-a-Tara	Figure 8.2: Te Awa Kairangi / Hutt River and Lower Hutt groundwater in Tables 8.8 and 8.9.	Support	Support in principle	Retain as notified.

S116 Taumata Arowai

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S116.001	General comments	General comments - definitions	Amend	Notes differing terminology used by different groups in different regions makes national comparison of environmental performance difficult. Notes the National Planning Standards establish definitions local authorities must use, and that other wastewater, stormwater and drinking water terminology (including bore, community drinking water supply, drain, greywater, group drinking water supply, health needs of people, sludge, wastewater, wastewater network, water sensitive urban design) in the NRP have not been amended through PC1 to align with the Planning Standards. Supports amendments to these terms.	Requests that terminology (existing terms not proposed to be amended in PC1, including bore, community drinking water supply, drain, greywater, group drinking water supply, health needs of people, sludge, wastewater, wastewater network, water sensitive urban design) is aligned with that used in the NPS, WSA, and that being developed by Taumata Arowai, as possible and appropriate.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S116.002	General comments	General comments - definitions	Amend	Notes the WSA framework for identification, monitoring, and management of risks to water sources is intended to work together with resource management legislation. Notes changes are made to rules that recognise proximity to source water intakes but that no change has been made to the reference to drinking water supplies (community drinking water supply and group drinking water supply) and these references are out of date due to the repeal of the Health (Drinking Water Amendment Act) 2007 and enactment of the WSA.	Amend definitions of community drinking water supply and group drinking water supply as appropriate to reflect legislative changes to what constitutes a drinking water supply.
S116.003	2 Interpretation	Containment standard	Amend	Notes differing terminology used by different groups in different regions makes national comparison of environmental performance difficult. Taumata Arowai will define discharges based on root causes rather than weather condition (e.g. dry weather discharge and wet weather discharge) and is working to establish nationally consistent wastewater and stormwater terminology. Also noted that the National Planning Standards establish definitions local authorities must use, and that other wastewater, stormwater and drinking water terminology in the NRP have not been amended to align with the Planning Standards. Considers definitions between Taumata Arowai and GWRC should align or at a minimum, not conflict, as this could lead to reporting complications for network operators who need to provide data to both Taumata Arowai and GWRC.	Requests that terminology is aligned with that used in the NPS, WSA, and that being developed by Taumata Arowai, as possible and appropriate. Requests that consideration be given to replacing the descriptors 'dry weather discharge' and 'wet weather discharge', to instead describe wastewater network discharges based on their root cause e.g. a discharge caused by blockages, a discharge caused by plant failure or equipment damage, or a discharge being caused by capacity being exceeded in the wastewater network.
S116.004	2 Interpretation	Dry weather discharges	Amend	Notes that differing terminology used by different groups in different regions makes national comparison of environmental performance difficult. Taumata Arowai will define discharges based on root causes rather than weather condition (e.g. dry weather discharge and wet weather discharge) and is working to establish nationally consistent wastewater and stormwater terminology. Also noted	Requests that terminology is aligned with that used in the NPS, WSA, and that being developed by Taumata Arowai, as possible and appropriate. Requests that consideration be given to replacing the descriptors 'dry weather discharge' and 'wet weather discharge', to instead describe wastewater network discharges based on their root cause e.g. a discharge caused by blockages, a discharge caused by plant

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				that the National Planning Standards establish definitions local authorities must use, and that other wastewater, stormwater and drinking water terminology in the NRP have not been amended to align with the Planning Standards. Considers definitions between Taumata Arowai and GWRC should align or at a minimum, not conflict, as this could lead to reporting complications for network operators who need to provide data to both Taumata Arowai and GWRC.	failure or equipment damage, or a discharge being caused by capacity being exceeded in the wastewater network.
S116.005	2 Interpretation	Existing wastewater discharge	Amend	Notes that differing terminology used by different groups in different regions makes national comparison of environmental performance difficult. Taumata Arowai will define discharges based on root causes rather than weather condition (e.g. dry weather discharge and wet weather discharge) and is working to establish nationally consistent wastewater and stormwater terminology. Also noted that the National Planning Standards establish definitions local authorities must use, and that other wastewater, stormwater and drinking water terminology in the NRP have not been amended to align with the Planning Standards. Considers definitions between Taumata Arowai and GWRC should align or at a minimum, not conflict, as this could lead to reporting complications for network operators who need to provide data to both Taumata Arowai and GWRC.	Requests that terminology is aligned with that used in the NPS, WSA, and that being developed by Taumata Arowai, as possible and appropriate. Requests that consideration be given to replacing the descriptors 'dry weather discharge' and 'wet weather discharge', to instead describe wastewater network discharges based on their root cause e.g. a discharge caused by blockages, a discharge caused by plant failure or equipment damage, or a discharge being caused by capacity being exceeded in the wastewater network.
S116.006	2 Interpretation	High risk industrial or trade premise	Amend	Notes that differing terminology used by different groups in different regions makes national comparison of environmental performance difficult. Taumata Arowai will define discharges based on root causes rather than weather condition (e.g. dry weather discharge and wet weather discharge) and is working to establish nationally consistent wastewater and stormwater terminology. Also noted	Requests that terminology is aligned with that used in the NPS, WSA, and that being developed by Taumata Arowai, as possible and appropriate. Requests that consideration be given to replacing the descriptors 'dry weather discharge' and 'wet weather discharge', to instead describe wastewater network discharges based on their root cause e.g. a discharge caused by blockages, a discharge caused by plant

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				that the National Planning Standards establish definitions local authorities must use, and that other wastewater, stormwater and drinking water terminology in the NRP have not been amended to align with the Planning Standards. Considers definitions between Taumata Arowai and GWRC should align or at a minimum, not conflict, as this could lead to reporting complications for network operators who need to provide data to both Taumata Arowai and GWRC.	failure or equipment damage, or a discharge being caused by capacity being exceeded in the wastewater network.
S116.007	2 Interpretation	Hydrological control	Amend	Notes that differing terminology used by different groups in different regions makes national comparison of environmental performance difficult. Taumata Arowai will define discharges based on root causes rather than weather condition (e.g. dry weather discharge and wet weather discharge) and is working to establish nationally consistent wastewater and stormwater terminology. Also noted that the National Planning Standards establish definitions local authorities must use, and that other wastewater, stormwater and drinking water terminology in the NRP have not been amended to align with the Planning Standards. Considers definitions between Taumata Arowai and GWRC should align or at a minimum, not conflict, as this could lead to reporting complications for network operators who need to provide data to both Taumata Arowai and GWRC.	Requests that terminology is aligned with that used in the NPS, WSA, and that being developed by Taumata Arowai, as possible and appropriate. Requests that consideration be given to replacing the descriptors 'dry weather discharge' and 'wet weather discharge', to instead describe wastewater network discharges based on their root cause e.g. a discharge caused by blockages, a discharge caused by plant failure or equipment damage, or a discharge being caused by capacity being exceeded in the wastewater network.
S116.008	2 Interpretation	Impervious surfaces	Amend	Notes that differing terminology used by different groups in different regions makes national comparison of environmental performance difficult. Taumata Arowai will define discharges based on root causes rather than weather condition (e.g. dry weather discharge and wet weather discharge) and is working to establish nationally consistent wastewater and stormwater terminology. Also noted	Requests that terminology is aligned with that used in the NPS, WSA, and that being developed by Taumata Arowai, as possible and appropriate. Requests that consideration be given to replacing the descriptors 'dry weather discharge' and 'wet weather discharge', to instead describe wastewater network discharges based on their root cause e.g. a discharge caused by blockages, a discharge caused by plant

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				that the National Planning Standards establish definitions local authorities must use, and that other wastewater, stormwater and drinking water terminology in the NRP have not been amended to align with the Planning Standards. Considers definitions between Taumata Arowai and GWRC should align or at a minimum, not conflict, as this could lead to reporting complications for network operators who need to provide data to both Taumata Arowai and GWRC.	failure or equipment damage, or a discharge being caused by capacity being exceeded in the wastewater network.
S116.009	2 Interpretation	Stormwater	Amend	Notes that differing terminology used by different groups in different regions makes national comparison of environmental performance difficult. Taumata Arowai will define discharges based on root causes rather than weather condition (e.g. dry weather discharge and wet weather discharge) and is working to establish nationally consistent wastewater and stormwater terminology. Also noted that the National Planning Standards establish definitions local authorities must use, and that other wastewater, stormwater and drinking water terminology in the NRP have not been amended to align with the Planning Standards. Considers definitions between Taumata Arowai and GWRC should align or at a minimum, not conflict, as this could lead to reporting complications for network operators who need to provide data to both Taumata Arowai and GWRC.	Requests that terminology is aligned with that used in the NPS, WSA, and that being developed by Taumata Arowai, as possible and appropriate. Requests that consideration be given to replacing the descriptors 'dry weather discharge' and 'wet weather discharge', to instead describe wastewater network discharges based on their root cause e.g. a discharge caused by blockages, a discharge caused by plant failure or equipment damage, or a discharge being caused by capacity being exceeded in the wastewater network.
S116.010	2 Interpretation	Stormwater catchment or sub-catchment	Amend	Notes that differing terminology used by different groups in different regions makes national comparison of environmental performance difficult. Taumata Arowai will define discharges based on root causes rather than weather condition (e.g. dry weather discharge and wet weather discharge) and is working to establish nationally consistent wastewater and stormwater terminology. Also noted	Requests that terminology is aligned with that used in the NPS, WSA, and that being developed by Taumata Arowai, as possible and appropriate. Requests that consideration be given to replacing the descriptors 'dry weather discharge' and 'wet weather discharge', to instead describe wastewater network discharges based on their root cause e.g. a discharge caused by blockages, a discharge caused by plant

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				that the National Planning Standards establish definitions local authorities must use, and that other wastewater, stormwater and drinking water terminology in the NRP have not been amended to align with the Planning Standards. Considers definitions between Taumata Arowai and GWRC should align or at a minimum, not conflict, as this could lead to reporting complications for network operators who need to provide data to both Taumata Arowai and GWRC.	failure or equipment damage, or a discharge being caused by capacity being exceeded in the wastewater network.
S116.011	2 Interpretation	Stormwater management strategy	Amend	Notes that differing terminology used by different groups in different regions makes national comparison of environmental performance difficult. Taumata Arowai will define discharges based on root causes rather than weather condition (e.g. dry weather discharge and wet weather discharge) and is working to establish nationally consistent wastewater and stormwater terminology. Also noted that the National Planning Standards establish definitions local authorities must use, and that other wastewater, stormwater and drinking water terminology in the NRP have not been amended to align with the Planning Standards. Considers definitions between Taumata Arowai and GWRC should align or at a minimum, not conflict, as this could lead to reporting complications for network operators who need to provide data to both Taumata Arowai and GWRC.	Requests that terminology is aligned with that used in the NPS, WSA, and that being developed by Taumata Arowai, as possible and appropriate. Requests that consideration be given to replacing the descriptors 'dry weather discharge' and 'wet weather discharge', to instead describe wastewater network discharges based on their root cause e.g. a discharge caused by blockages, a discharge caused by plant failure or equipment damage, or a discharge being caused by capacity being exceeded in the wastewater network.
S116.012	2 Interpretation	Stormwater network	Amend	Notes that differing terminology used by different groups in different regions makes national comparison of environmental performance difficult. Taumata Arowai will define discharges based on root causes rather than weather condition (e.g. dry weather discharge and wet weather discharge) and is working to establish nationally consistent wastewater and stormwater terminology. Also noted	Requests that terminology is aligned with that used in the NPS, WSA, and that being developed by Taumata Arowai, as possible and appropriate. Requests that consideration be given to replacing the descriptors 'dry weather discharge' and 'wet weather discharge', to instead describe wastewater network discharges based on their root cause e.g. a discharge caused by blockages, a discharge caused by plant

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				that the National Planning Standards establish definitions local authorities must use, and that other wastewater, stormwater and drinking water terminology in the NRP have not been amended to align with the Planning Standards. Considers definitions between Taumata Arowai and GWRC should align or at a minimum, not conflict, as this could lead to reporting complications for network operators who need to provide data to both Taumata Arowai and GWRC.	failure or equipment damage, or a discharge being caused by capacity being exceeded in the wastewater network.
S116.013	2 Interpretation	Stormwater treatment system	Amend	Notes that differing terminology used by different groups in different regions makes national comparison of environmental performance difficult. Taumata Arowai will define discharges based on root causes rather than weather condition (e.g. dry weather discharge and wet weather discharge) and is working to establish nationally consistent wastewater and stormwater terminology. Also noted that the National Planning Standards establish definitions local authorities must use, and that other wastewater, stormwater and drinking water terminology in the NRP have not been amended to align with the Planning Standards. Considers definitions between Taumata Arowai and GWRC should align or at a minimum, not conflict, as this could lead to reporting complications for network operators who need to provide data to both Taumata Arowai and GWRC.	Requests that terminology is aligned with that used in the NPS, WSA, and that being developed by Taumata Arowai, as possible and appropriate. Requests that consideration be given to replacing the descriptors 'dry weather discharge' and 'wet weather discharge', to instead describe wastewater network discharges based on their root cause e.g. a discharge caused by blockages, a discharge caused by plant failure or equipment damage, or a discharge being caused by capacity being exceeded in the wastewater network.
S116.014	2 Interpretation	Wastewater network catchment or sub-catchment	Amend	Notes that differing terminology used by different groups in different regions makes national comparison of environmental performance difficult. Taumata Arowai will define discharges based on root causes rather than weather condition (e.g. dry weather discharge and wet weather discharge) and is working to establish nationally consistent wastewater and stormwater terminology. Also noted	Requests that terminology is aligned with that used in the NPS, WSA, and that being developed by Taumata Arowai, as possible and appropriate. Requests that consideration be given to replacing the descriptors 'dry weather discharge' and 'wet weather discharge', to instead describe wastewater network discharges based on their root cause e.g. a discharge caused by blockages, a discharge caused by plant

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				that the National Planning Standards establish definitions local authorities must use, and that other wastewater, stormwater and drinking water terminology in the NRP have not been amended to align with the Planning Standards. Considers definitions between Taumata Arowai and GWRC should align or at a minimum, not conflict, as this could lead to reporting complications for network operators who need to provide data to both Taumata Arowai and GWRC.	failure or equipment damage, or a discharge being caused by capacity being exceeded in the wastewater network.
S116.015	2 Interpretation	Wet weather overflows	Amend	Notes that differing terminology used by different groups in different regions makes national comparison of environmental performance difficult. Taumata Arowai will define discharges based on root causes rather than weather condition (e.g. dry weather discharge and wet weather discharge) and is working to establish nationally consistent wastewater and stormwater terminology. Also noted that the National Planning Standards establish definitions local authorities must use, and that other wastewater, stormwater and drinking water terminology in the NRP have not been amended to align with the Planning Standards. Considers definitions between Taumata Arowai and GWRC should align or at a minimum, not conflict, as this could lead to reporting complications for network operators who need to provide data to both Taumata Arowai and GWRC.	Requests that terminology is aligned with that used in the NPS, WSA, and that being developed by Taumata Arowai, as possible and appropriate. Requests that consideration be given to replacing the descriptors 'dry weather discharge' and 'wet weather discharge', to instead describe wastewater network discharges based on their root cause e.g. a discharge caused by blockages, a discharge caused by plant failure or equipment damage, or a discharge being caused by capacity being exceeded in the wastewater network.
S116.016	9 Te Awarua-o-Porirua Whaitua	Policy P118: Water takes at minimum flows and minimum	Amend	Notes the WSA framework for identification, monitoring and management of risks to water sources is intended to work together with resource management legislation. Notes changes are made to rules that recognise proximity to source water intakes but that no change has been made to the reference to drinking water supplies (community drinking water supply and group drinking water	Amend provisions as appropriate to reflect legislative changes to what constitutes a drinking water supply.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		water levels.		supply) and these references are out of date due to the repeal of the Health (Drinking Water Amendment Act) 2007 and enactment of the WSA.	
S116.017	5.1 Air quality rules	5.1.13 Discharge of agrichemicals.	Amend	Notes that the WSA framework for identification, monitoring and management of risks to water sources is intended to work together with resource management legislation. Notes that changes are made to rules that recognise proximity to source water intakes but that no change has been made to the reference to drinking water supplies (community drinking water supply and group drinking water supply) and these references are out of date due to the repeal of the Health (Drinking Water Amendment Act) 2007 and enactment of the WSA.	Amend provisions as appropriate to reflect legislative changes to what constitutes a drinking water supply.
S116.018	5.2 and 5.3 Discharges to land and water and land use rules	Rule R106: Earthworks and vegetation clearance for renewable energy generation - restricted discretionary activity.	Amend	Notes the WSA framework for identification, monitoring, and management of risks to water sources is intended to work together with resource management legislation. Notes changes are made to rules that recognise proximity to source water intakes but that no change has been made to the reference to drinking water supplies (community drinking water supply and group drinking water supply) and these references are out of date due to the repeal of the Health (Drinking Water Amendment Act) 2007 and enactment of the WSA.	Amend provisions as appropriate to reflect legislative changes to what constitutes a drinking water supply.
S116.019	6 Other methods	Method M36: Freshwater Action Plan programme.	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).
S116.020	6 Other methods	Method M37: Freshwate	Support	Notes that managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and	Retain as notified (except as requested to be amended by mana whenua).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		r Action Plan for the Parangarahu Lakes.		use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	
S116.021	6 Other methods	Method M38: Freshwater Action Plan for the Rangitikei catchment.	Support	Notes that managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).
S116.022	6 Other methods	Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Support	Notes that managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).
S116.023	6 Other methods	Method M40: Fish passage action plan programm	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and	Retain as notified (except as requested to be amended by mana whenua).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		e for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.		acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	
S116.024	6 Other methods	Method M43: Supporting the health of urban waterbodies.	Support	Supports this proposed Method, particularly as expressed in clauses (a) and (b).	Retain as notified, in particular clauses (a) and (b).
S116.025	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).
S116.026	8 Whaitua Te	Objective WH.O2:	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports	Retain as notified (except as requested to be amended by mana whenua).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora.		acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	
S116.027	8 Whaitua Te Whanganui-a-Tara	Objective WH.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or	Support	Notes that managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		improved to achieve the coastal water objectives set out in Table 8.1.			
S116.028	8 Whaitua Te Whanganui-a-Tara	Objective WH.O5: By 2040 the health and wellbeing of the Parangarahu Lakes and associated natural wetlands are on a trajectory of improvement towards wai ora.	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).
S116.029	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligns, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		water objectives.		stormwater management strategy) might be developed, reviewed and implemented, to meet both.	
S116.030	8 Whaitua Te Whanganui-a-Tara	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).
S116.031	8 Whaitua Te Whanganui-a-Tara	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligns, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.032	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligns, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	
S116.033	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligns, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.034	8 Whaitua Te Whanganui-a-Tara	Policy WH.P12: Managing stormwater from a port or airport.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligns, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.035	8 Whaitua Te Whanganui-a-Tara	Policy WH.P13: Managing stormwater network discharges	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		through a Stormwater Management Strategy.		well aligns, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	
S116.036	8 Whaitua Te Whanganui-a-Tara	Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy.	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).
S116.037	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligns, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.038	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater	Amend	Notes 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	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		contaminant offsetting for new greenfield development.		discharge. Considers that complementary provisions between the RMA, WSA and WSEA are well aligns, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	
S116.039	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligns, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.040	8 Whaitua Te Whanganui-a-Tara	Policy WH.P17: General wastewater policy to achieve target attribute states and coastal objectives.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligns, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S116.041	8 Whaitua Te Whanganui-a-Tara	Policy WH.P18: Progressing works to meet Escherichia coli target attribute states.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligns, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.042	8 Whaitua Te Whanganui-a-Tara	Policy WH.P19: Managing wastewater network catchment discharges.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligns, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.043	8 Whaitua Te Whanganui-a-Tara	Policy WH.P19: Managing wastewater network catchment discharges.	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).
S116.044	8 Whaitua Te	Policy WH.P19:	Amend	Notes the WSA framework for identification, monitoring and management of risks to water	Amend provisions as appropriate to reflect legislative changes to what constitutes a drinking water supply.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	Managing wastewater network catchment discharges.		sources is intended to work together with resource management legislation. Notes that changes are made to rules that recognise proximity to source water intakes but that no change has been made to the reference to drinking water supplies (community drinking water supply and group drinking water supply) and these references are out of date due to the repeal of the Health (Drinking Water Amendment Act) 2007 and enactment of the WSA.	
S116.045	8 Whaitua Te Whanganui-a-Tara	Policy WH.P20: Managing existing wastewater treatment plant discharges.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligns, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.046	8 Whaitua Te Whanganui-a-Tara	Policy WH.P20: Managing existing wastewater treatment plant discharges.	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).
S116.047	8 Whaitua Te Whanganui-a-Tara	Policy WH.P33: Core allocation in Whaitua Te	Amend	Notes the WSA framework for identification, monitoring and management of risks to water sources is intended to work together with resource management legislation. Notes that changes are made to rules that recognise proximity to source water intakes but that no change has been made to the reference to drinking water supplies (community	Amend provisions as appropriate to reflect legislative changes to what constitutes a drinking water supply.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Whanganui-a-Tara.		drinking water supply and group drinking water supply) and these references are out of date due to the repeal of the Health (Drinking Water Amendment Act) 2007 and enactment of the WSA.	
S116.048	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligns, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.049	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).
S116.050	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual property to surface	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligns, efficient, effective, and duplication is avoided where possible. Suggests a	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		water or coastal water - permitted activity.		solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	
S116.051	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Support	Notes that managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).
S116.052	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligns, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.053	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces -	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
S116.054	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligns, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.055	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.056	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		urbanised areas - controlled activity.		(e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	
S116.057	8 Whaitua Te Whanganui-a-Tara	Rule WH.R8: Stormwater from a port or airport - restricted discretionary activity.	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).
S116.058	8 Whaitua Te Whanganui-a-Tara	Rule WH.R8: Stormwater from a port or airport - restricted discretionary activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.059	8 Whaitua Te Whanganui-a-Tara	Rule WH.R9: Stormwater from a local authority or state highway network- restricted discretionary activity.	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S116.060	8 Whaitua Te Whanganui-a-Tara	Rule WH.R9: Stormwater from a local authority or state highway network-restricted discretionary activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.061	8 Whaitua Te Whanganui-a-Tara	Rule WH.R9: Stormwater from a local authority or state highway network-restricted discretionary activity.	Amend	Notes the WSA framework for identification, monitoring and management of risks to water sources is intended to work together with resource management legislation. Notes that changes are made to rules that recognise proximity to source water intakes but that no change has been made to the reference to drinking water supplies (community drinking water supply and group drinking water supply) and these references are out of date due to the repeal of the Health (Drinking Water Amendment Act) 2007 and enactment of the WSA.	Amend provisions as appropriate to reflect legislative changes to what constitutes a drinking water supply.
S116.062	8 Whaitua Te Whanganui-a-Tara	Rule WH.R10: Stormwater from new state highways-discretionary activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S116.063	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.064	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.065	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				developed, reviewed and implemented, to meet both.	
S116.066	8 Whaitua Te Whanganui-a-Tara	Rule WH.R14: Wastewater network catchment discharges - restricted discretionary activity.	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).
S116.067	8 Whaitua Te Whanganui-a-Tara	Rule WH.R14: Wastewater network catchment discharges - restricted discretionary activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.068	8 Whaitua Te Whanganui-a-Tara	Rule WH.R14: Wastewater network catchment discharges - restricted discretionary activity.	Amend	Considers it critical that discharges from blockages, plant failure or equipment damage, and capacity exceedance are acknowledged and appropriately controlled. Considers acknowledging these discharges ensures the network operator identifies where they occur, how, why, and when. It means they can be monitored; a plan developed to reduce them or avoid their occurrence and enables an agreed response to their occurrence.	Acknowledge and provide for all discharges from the wastewater network to the environment. Requests that consideration be given to replacing the descriptors 'dry weather discharge' and 'wet weather discharge', to instead describe wastewater network discharges based on their root cause e.g. a discharge caused by blockages, a discharge caused by plant failure or equipment damage, or a discharge being caused by capacity being exceeded in the wastewater network.
S116.069	8 Whaitua Te Whanganui-a-Tara	Rule WH.R14: Wastewater network catchment	Amend	Notes the WSA framework for identification, monitoring and management of risks to water sources is intended to work together with resource management legislation. Notes that changes are made to rules that recognise proximity to source	Amend provisions as appropriate to reflect legislative changes to what constitutes a drinking water supply.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discharges - restricted discretionary activity.		water intakes but that no change has been made to the reference to drinking water supplies (community drinking water supply and group drinking water supply) and these references are out of date due to the repeal of the Health (Drinking Water Amendment Act) 2007 and enactment of the WSA.	
S116.070	8 Whaitua Te Whanganui-a-Tara	Rule WH.R15: Existing wastewater discharges from a treatment plant - discretionary activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.071	8 Whaitua Te Whanganui-a-Tara	Rule WH.R15: Existing wastewater discharges from a treatment plant - discretionary activity.	Amend	Considers it critical that discharges from blockages, plant failure or equipment damage, and capacity exceedance are acknowledged and appropriately controlled. Considers acknowledging these discharges ensures the network operator identifies where they occur, how, why, and when. It means they can be monitored; a plan developed to reduce them or avoid their occurrence and enables an agreed response to their occurrence.	Acknowledge and provide for all discharges from the wastewater network to the environment. Requests that consideration be given to replacing the descriptors 'dry weather discharge' and 'wet weather discharge', to instead describe wastewater network discharges based on their root cause e.g. a discharge caused by blockages, a discharge caused by plant failure or equipment damage, or a discharge being caused by capacity being exceeded in the wastewater network.
S116.072	8 Whaitua Te Whanganui-a-Tara	Rule WH.R16: All other discharges of wastewater - non-	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		complying activity.		be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	
S116.073	8 Whaitua Te Whanganui-a-Tara	Rule WH.R16: All other discharges of wastewater - non-complying activity.	Amend	Considers it critical that discharges from blockages, plant failure or equipment damage, and capacity exceedance are acknowledged and appropriately controlled. Considers acknowledging these discharges ensures the network operator identifies where they occur, how, why, and when. It means they can be monitored; a plan developed to reduce them or avoid their occurrence and enables an agreed response to their occurrence.	Acknowledge and provide for all discharges from the wastewater network to the environment. Requests that consideration be given to replacing the descriptors 'dry weather discharge' and 'wet weather discharge', to instead describe wastewater network discharges based on their root cause e.g. a discharge caused by blockages, a discharge caused by plant failure or equipment damage, or a discharge being caused by capacity being exceeded in the wastewater network.
S116.074	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	Notes the WSA framework for identification, monitoring and management of risks to water sources is intended to work together with resource management legislation. Notes that changes are made to rules that recognise proximity to source water intakes but that no change has been made to the reference to drinking water supplies (community drinking water supply and group drinking water supply) and these references are out of date due to the repeal of the Health (Drinking Water Amendment Act) 2007 and enactment of the WSA.	Amend provisions as appropriate to reflect legislative changes to what constitutes a drinking water supply.
S116.075	8 Whaitua Te Whanganui-a-Tara	Rule WH.R33: Take and use of water in the Whaitua Te Whanganui-a Tara - restricted discretionary activity.	Amend	Notes the WSA framework for identification, monitoring and management of risks to water sources is intended to work together with resource management legislation. Notes that changes are made to rules that recognise proximity to source water intakes but that no change has been made to the reference to drinking water supplies (community drinking water supply and group drinking water supply) and these references are out of date due to the repeal of the Health (Drinking Water Amendment Act) 2007 and enactment of the WSA.	Amend provisions as appropriate to reflect legislative changes to what constitutes a drinking water supply.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S116.076	8 Whaitua Te Whanganui-a-Tara	Rule WH.R34: Take and use of water in the Whaitua Te Whanganui-a-Tara - discretionary activity.	Amend	Notes the WSA framework for identification, monitoring and management of risks to water sources is intended to work together with resource management legislation. Notes that changes are made to rules that recognise proximity to source water intakes but that no change has been made to the reference to drinking water supplies (community drinking water supply and group drinking water supply) and these references are out of date due to the repeal of the Health (Drinking Water Amendment Act) 2007 and enactment of the WSA.	Amend provisions as appropriate to reflect legislative changes to what constitutes a drinking water supply.
S116.077	9 Te Awarua-o-Porirua Whaitua	Objective P.O1: The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100.	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).
S116.078	9 Te Awarua-	Objective P.O2: Te Awarua-o-	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and	Retain as notified (except as requested to be amended by mana whenua).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	Porirua's groundwater, rivers, lakes and natural wetlands, and their margins are on a trajectory of measurable improvement towards wai ora.		use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	
S116.079	9 Te Awarua-o-Porirua Whaitua	Objective P.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Pāuatahanui Inlet, Onepoto Arm and the open coastal areas of Te Awarua-o-Porirua is maintaine	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		d or improved to achieve the coastal water objectives set out in Table 9.1.			
S116.080	9 Te Awarua-o-Porirua Whaitua	Objective P.O6: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).
S116.081	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.082	9 Te Awarua-	Policy P.P3:	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports	Retain as notified (except as requested to be amended by mana whenua).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	Freshwater Action Plans role in the health and wellbeing of waterways.		acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	
S116.083	9 Te Awarua-o-Porirua Whaitua	Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.084	9 Te Awarua-o-Porirua Whaitua	Policy P.P10: Managing adverse effects of stormwater discharges.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.085	9 Te Awarua-	Policy P.P11: Discharge	Amend	Notes policies and rules that establish requirements for wastewater and stormwater networks provide clarity to network operators and will have a bearing	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	s of a contaminant in stormwater from high risk industrial or trade premises.		on the quality and quantity of contaminant discharge. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	
S116.086	9 Te Awarua-o-Porirua Whaitua	Policy P.P12: Managing stormwater network discharges through a Stormwater Management Strategy.	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).
S116.087	9 Te Awarua-o-Porirua Whaitua	Policy P.P12: Managing stormwater network discharges through a Stormwater Management Strategy.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.088	9 Te Awarua-	Policy P.P13: Stormwate	Amend	Notes policies and rules that establish requirements for wastewater and stormwater networks provide clarity to network operators and will have a bearing	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	r discharges from new and redeveloped impervious surfaces.		on the quality and quantity of contaminant discharge. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	
S116.089	9 Te Awarua-o-Porirua Whaitua	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.090	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.091	9 Te Awarua-	Policy P.P16:	Amend	Notes policies and rules that establish requirements for wastewater and stormwater networks provide	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	General wastewater policy to achieve target attribute states and coastal water objectives.		clarity to network operators and will have a bearing on the quality and quantity of contaminant discharge. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	effective, and unnecessary duplication is avoided.
S116.092	9 Te Awarua-o-Porirua Whaitua	Policy P.P17: Progressing works to meet Escherichia coli target attribute states.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.093	9 Te Awarua-o-Porirua Whaitua	Policy P.P18: Managing wastewater network catchment discharges.	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).
S116.094	9 Te Awarua-o-Porirua Whaitua	Policy P.P18: Managing wastewater network catchment	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discharges .		well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	
S116.095	9 Te Awarua-o-Porirua Whaitua	Policy P.P19: Managing existing wastewater treatment plant discharges .	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).
S116.096	9 Te Awarua-o-Porirua Whaitua	Policy P.P19: Managing existing wastewater treatment plant discharges .	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.097	9 Te Awarua-o-Porirua Whaitua	Rule P.R2: Stormwater to land - permitted activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	
S116.098	9 Te Awarua-o-Porirua Whaitua	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).
S116.099	9 Te Awarua-o-Porirua Whaitua	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.100	9 Te Awarua-o-Porirua Whaitua	Rule P.R4: Stormwater from an existing high risk industrial or trade premise -	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
S116.101	9 Te Awarua-o-Porirua Whaitua	Rule P.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.102	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).
S116.103	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S116.104	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.105	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas- controlled activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.106	9 Te Awarua-o-Porirua Whaitua	Rule P.R8: Stormwater from a local authority or state highway network- restricted discretionary activity.	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S116.107	9 Te Awarua-o-Porirua Whaitua	Rule P.R8: Stormwater from a local authority or state highway network-restricted discretionary activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.108	9 Te Awarua-o-Porirua Whaitua	Rule P.R8: Stormwater from a local authority or state highway network-restricted discretionary activity.	Amend	Notes the WSA framework for identification, monitoring and management of risks to water sources is intended to work together with resource management legislation. Notes that changes are made to rules that recognise proximity to source water intakes but that no change has been made to the reference to drinking water supplies (community drinking water supply and group drinking water supply) and these references are out of date due to the repeal of the Health (Drinking Water Amendment Act) 2007 and enactment of the WSA.	Amend provisions as appropriate to reflect legislative changes to what constitutes a drinking water supply.
S116.109	9 Te Awarua-o-Porirua Whaitua	Rule P.R9: Stormwater from new state highways-discretionary activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S116.110	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.111	9 Te Awarua-o-Porirua Whaitua	Rule P.R11: All other stormwater discharges - non-complying activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.112	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				developed, reviewed and implemented, to meet both.	
S116.113	9 Te Awarua-o-Porirua Whaitua	Rule P.R13: Wastewater network catchment discharges to water - restricted discretionary activity.	Support	Notes managing stormwater and wastewater discharges is important to Māori. Supports acknowledgment of Māori customary practice and use of wai, the partnership role of mana whenua in developing freshwater action plans, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.	Retain as notified (except as requested to be amended by mana whenua).
S116.114	9 Te Awarua-o-Porirua Whaitua	Rule P.R13: Wastewater network catchment discharges to water - restricted discretionary activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.115	9 Te Awarua-o-Porirua Whaitua	Rule P.R13: Wastewater network catchment discharges to water - restricted discretionary activity.	Amend	Considers it critical that discharges from blockages, plant failure or equipment damage, and capacity exceedance are acknowledged and appropriately controlled. Considers acknowledging these discharges ensures the network operator identifies where they occur, how, why, and when. It means they can be monitored; a plan developed to reduce them or avoid their occurrence and enables an agreed response to their occurrence.	Acknowledge and provide for all discharges from the wastewater network to the environment. Requests that consideration be given to replacing the descriptors 'dry weather discharge' and 'wet weather discharge', to instead describe wastewater network discharges based on their root cause e.g. a discharge caused by blockages, a discharge caused by plant failure or equipment damage, or a discharge being caused by capacity being exceeded in the wastewater network.
S116.116	9 Te Awarua-	Rule P.R13: Wastewat	Amend	Notes the WSA framework for identification, monitoring and management of risks to water sources is intended to work together with resource	Amend provisions as appropriate to reflect legislative changes to what constitutes a drinking water supply.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	er network catchment discharges to water - restricted discretionary activity.		management legislation. Notes that changes are made to rules that recognise proximity to source water intakes but that no change has been made to the reference to drinking water supplies (community drinking water supply and group drinking water supply) and these references are out of date due to the repeal of the Health (Drinking Water Amendment Act) 2007 and enactment of the WSA.	
S116.117	9 Te Awarua-o-Porirua Whaitua	Rule P.R14: Existing wastewater discharges from a treatment plant to coastal and freshwater - discretionary activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.118	9 Te Awarua-o-Porirua Whaitua	Rule P.R14: Existing wastewater discharges from a treatment plant to coastal and freshwater - discretionary activity.	Amend	Considers it critical that discharges from blockages, plant failure or equipment damage, and capacity exceedance are acknowledged and appropriately controlled. Considers acknowledging these discharges ensures the network operator identifies where they occur, how, why, and when. It means they can be monitored; a plan developed to reduce them or avoid their occurrence and enables an agreed response to their occurrence.	Acknowledge and provide for all discharges from the wastewater network to the environment. Requests that consideration be given to replacing the descriptors 'dry weather discharge' and 'wet weather discharge', to instead describe wastewater network discharges based on their root cause e.g. a discharge caused by blockages, a discharge caused by plant failure or equipment damage, or a discharge being caused by capacity being exceeded in the wastewater network.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S116.119	9 Te Awarua-o-Porirua Whaitua	Rule P.R15: All other discharges of wastewater - non-complying activity.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.120	9 Te Awarua-o-Porirua Whaitua	Rule P.R15: All other discharges of wastewater - non-complying activity.	Amend	Considers it critical that discharges from blockages, plant failure or equipment damage, and capacity exceedance are acknowledged and appropriately controlled. Considers acknowledging these discharges ensures the network operator identifies where they occur, how, why, and when. It means they can be monitored; a plan developed to reduce them or avoid their occurrence and enables an agreed response to their occurrence.	Acknowledge and provide for all discharges from the wastewater network to the environment. Requests that consideration be given to replacing the descriptors 'dry weather discharge' and 'wet weather discharge', to instead describe wastewater network discharges based on their root cause e.g. a discharge caused by blockages, a discharge caused by plant failure or equipment damage, or a discharge being caused by capacity being exceeded in the wastewater network.
S116.121	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Amend	Notes the WSA framework for identification, monitoring and management of risks to water sources is intended to work together with resource management legislation. Notes that changes are made to rules that recognise proximity to source water intakes but that no change has been made to the reference to drinking water supplies (community drinking water supply and group drinking water supply) and these references are out of date due to the repeal of the Health (Drinking Water Amendment Act) 2007 and enactment of the WSA.	Amend provisions as appropriate to reflect legislative changes to what constitutes a drinking water supply.
S116.122	9 Te Awarua-o-Porirua Whaitua	Rule P.R31: Take and use of water -	Amend	Notes the WSA framework for identification, monitoring and management of risks to water sources is intended to work together with resource management legislation. Notes that changes are made to rules that recognise proximity to source	Amend provisions as appropriate to reflect legislative changes to what constitutes a drinking water supply.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		restricted discretionary activity.		water intakes but that no change has been made to the reference to drinking water supplies (community drinking water supply and group drinking water supply) and these references are out of date due to the repeal of the Health (Drinking Water Amendment Act) 2007 and enactment of the WSA.	
S116.123	12 Schedules	Schedule 28: Stormwater Contaminant Treatment.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.124	12 Schedules	Schedule 29: Stormwater Impact Assessments.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligns, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.
S116.125	12 Schedules	Schedule 31: Stormwater Management	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.		well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	
S116.126	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Notes 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. Considers that complementary provisions between the RMA, WSA and WSEA are well aligned, efficient, effective, and duplication is avoided where possible. Suggests a solution may be signalling the relationship between the different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.	Provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided.

S176 Te Awarua o Porirua Harbour and Catchments Community Trust & Guardians of Pāuatahanui Inlet

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S176.001	General comments	General comments - overall	Support	Submitter supports incorporating the appropriate Whaitua Committee's recommendations into PC1 to the NRP as proposed.	Seeks PC1 should address issues to restore degraded and degrading ecosystems. Integrate PC1 with the related functions and initiatives from the respective statutory agencies, including GWRC, Porirua and Wellington City Councils and Wellington Water as current water managers.
S176.002	General comments	General comments - target attribute states	Support	Notes long-term target attribute timeframes require interim target attribute state timeframes set for intervals of not more than 10 years with baselines which need to be achieved by the interim target date set. Acknowledges outcomes sought from	Timeframes must contain interim and measurable milestones (including five yearly reporting). Retention of dates recommended by Whaitua Committee rather than pushing out the dates of achieving an improved

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				actions to improve ecosystem health will be a long-term prospect. But notes timeframes should not be arbitrarily set several decades in the future and must include interim and measurable milestones (such as five yearly intervals) in achieving the ultimate goal by 2040. Considers there must be a regular critique of the actions being implemented to ensure they are effective. Notes expectation to meet the target attribute states of water quality by 2040 and any delay will mean the community will have to (and continued risk of having to) continue living with an increasingly degraded environment and increased rehabilitation costs as a result. Notes need to establish meaningful and robust environmental limits through the inclusion of the limits recommended by the Whaitua Committee in 2019 . Supports the long-term goal of improvement to target attribute state. Notes Target Attribute States need to be set to allow maintenance and/or restoration of this level of ecosystem health, which in cases will likely involve setting limits and bottom lines well above the national bottom lines. Considers all waterbodies, not just rivers and streams, should have set Target Attribute States, this includes estuaries, wetlands, and groundwater. Considers a functional NRP requires objectives, policies, methods, rules, timelines and dates that are robust and scientifically based to succeed in restoring health to degraded waterbodies. Notes the NRP needs to provide clear guidance as to how these will be incorporated into existing and future resource consents and this is also applicable to developing resource consent conditions that allow for unambiguous enforcement options while	attribute state by decades. Ensure the environmental limits are set to achieve "ecological health" and other associated values such as recreation, amenity, and custodianship.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				undertaking compliance function of the Regional Council.	
S176.003	12 Schedules	Schedule 27: Freshwater Action Plan requirements.	Support	Supports requirement to develop Freshwater Action Plans. Supports approach of developing Freshwater Action Plans which protect, maintain, or enhance macroinvertebrate, periphyton, and fish abundance and community attributes as necessary and where applicable, where these communities also include life stage habitat protection actions for all species. Notes need to develop Freshwater Action Plans for urban catchments.	Retain requirement for Freshwater Action Plans
S176.004	6 Other methods	Method M36: Freshwater Action Plan programme.	Support	Supports requirement to develop Freshwater Action Plans. Supports approach of developing Freshwater Action Plans which protect, maintain, or enhance macroinvertebrate, periphyton, and fish abundance and community attributes as necessary and where applicable, where these communities also include life stage habitat protection actions for all species. Notes need to develop Freshwater Action Plans for urban catchments.	Retain requirement for Freshwater Action Plans
S176.005	General comments	General comments - overall	Amend	Considers there needs to be a focus on key contributors to contaminant loading in the harbour, including sedimentation, nitrogen, phosphorus, and bacterial (E. coli), and there is a need for urgent actions to address these environmental stressors that are driving degradation of waterbodies and harbour. Considers an approach to prioritise actions to improve ecosystem health can be modelled to ensure the key actions are prioritised and an	Suggests that PC1 policies related to stormwater discharge require demonstration of a functional need for that activity, and if there is a functional need, then the effects management hierarchy must be applied.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				evaluation can be made for potential improvements in estuary health arising from diversion of wastewater from an estuary, and estimating catchment diffuse nutrient load reductions required to meet estuary health objectives. Considers a focus on key contributors could provide potential leverage to increase the prioritisation of central government funding for cleaning up water bodies by highlighting the urgency of action. Considers a do-nothing approach is not an option and references the extent and health of eel grass (Zostera muelleri) beds has been reduced over many decades in Porirua Harbour, and sediment inputs into waterways from earthworks from new urban development (subdivision), land use, and forestry must be avoided or tightly controlled to allow freshwater and coastal receiving environments to be restored to a state of health and wellbeing. Considers rules and methods should focus on avoiding activities which contribute the most sediment from construction, subdivision development and forestry as the effects of these activities are seldom mitigated and never remedied. Considers the policies governing adverse effects of stormwater discharges (e.g., Policy P.P10, Policy WH. P10) contain clauses giving reasons to not put good management practices into effect. This is not supported in current form. When discussing adverse environmental impacts of stormwater or wastewater discharges, it is also required to actively consider ecosystem health - this requires a demonstration of a functional need for that activity, and if there is a functional need, then the effects management hierarchy must be applied. This should be referred to in the PC1 GWRC NRP.	

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S176.006	General comments	General comments - consultation	Amend	Supports inclusion of a method that provides for meaningful community engagement. Considers this would define requirements for structures and processes that enable communities to participate in all issues in advocating for environmental guardianship.	Include a method related to community engagement to ensure updates on progress of implementation are carried out - and actions are not deferred due to arguments of economic affordability or feasibility.
S176.007	5.4 Beds of lakes and rivers	Rule R151A: Ongoing diversion of a river - permitted activity.	Amend	Considers Rule 5.4.8 should be a discretionary activity to provide fish passage over artificial barriers such as dams even for those that have existed for 10 years or more - rather than reverting to permitted activity status. Considers if these are consented using permitted activity status, this will authorise a past decision which leaves a negative legacy and does not address the issues around fish passage that remain.	Make Rule R151A a discretionary activity
S176.008	General comments	General comments - overall	Not Stated	Expects the implementation of actions that result from plan changes will be appropriately resourced and funded.	Not stated.
S176.009	General comments	General comments - water bodies	Support	Supports rules and methods that provide for, or encourage, increasing the extent of wetland habitat in the rural landscape and in the river/stream corridors.	Clarify and strengthen rules and methods to support actions to increase wetland habitat.
S176.010	6 Other methods	Method M43: Supporting the health of urban waterbodies.	Support	Supports Methods M43 and M45 to support the health of, and funding for, urban waterbodies, particularly in relation to stormwater discharges - and considers this needs to be considered by the City Councils when assessing improving existing urban sites or urban development projects.	Not stated.
S176.011	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Support	Supports Method M44 to support health of rural water bodies. Notes in order for rural landowners to retire pasture and undertake protective fencing of vegetation, especially on high erosion prone slopes, there must be a sufficient quid-pro quo for landowners by way of incentives and financial relief. Does not support local authority suggestions that lower valuations of	Seeks the following be implemented: (a) investigate financial support and rates relief options for accelerating retirement/revegetation of pastoral and plantation forestry land uses, and (b) support the effective uptake and implementation of Farm Environment Plans, and (c) promote uptake of good management practice in rural land uses, including for pastoral farming and plantation

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				land and therefore lower rates are already baked in to rating formulas and sufficient to compensate landowners for "doing the right thing" for the environment.	forestry, and (d) develop and deliver a specific programme of engagement and education with small (<20ha) landowners.
S176.012	6 Other methods	Method M45: Funding of wastewater and stormwater network upgrades	Support	Supports Methods M43 and M45 to support the health of, and funding for, urban waterbodies, particularly in relation to stormwater discharges - and considers this needs to be considered by the City Councils when assessing improving existing urban sites or urban development projects.	Not stated.
S176.013	9 Te Awarua-o-Porirua Whaitua	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Support	Notes PC1 includes strong provisions (such as Policy P.P22) to reduce sediment discharges from farming activities on land with a high risk of erosion. Supports the measures proposed in P.P22 which will deliver farm management plans and risk erosion plans but notes implementing these can be costly to landowners and suggests support is needed for both risk erosion and farm management plans.	Not stated.

S229 Te Kamaru Station Ltd

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S229.001	General comments	General comments - overall	Oppose	Does not support the Plan Change 1 in its current form and opposes the broadbrush regulatory approach taken and the removal of local decision making. Agrees with the need to improve water quality - where it is poor and where the solutions are within our control - but considers fundamental	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				information is required to do this effectively and equitably. Asks council to recognise the work the submitter has done to date and partner with us in this work rather than regulate us.	
S229.002	General comments	General comments - consultation	Oppose	Concerned with a lack of consultation, content which is difficult for most people to understand, short timeframes to make submissions, and the submission timing just prior to Christmas. Notes opportunities that were missed that would have helped engagement, including: a.Direct mail contact with rural property owners, identified through council's rating database. b.Formal engagement with our Community Board; and c.Provision of information on the GWRC website - more accessible written information, invitation to the PC1 rural webinars/meeting. Additional forms of communication are essential if GWRC really wants meaningful community feedback.	Not stated
S229.003	General comments	General comments - economic cost/impact	Amend	Considers the cost of implementing the proposed changes on farms will be very high and will significantly impact farm viability as financial implications fall directly to individual landowners in rural communities. Considers the Plan Change lacks the flexibility to stage work. Considers the proposed changes will significantly devalue properties.	Remove PC1's regulatory approach. or provide a range of targeted support mechanisms to recognise the cost of implementation and to compensate for the ongoing loss of potential farm income.
S229.004	General comments	General comments - overall	Amend	Considers there is not sufficient information to know where water quality is a problem are and therefore how to effectively target work and PC1 proposes broad rules across multiple catchments instead of seeking to target interventions for the best outcomes. Notes there is only one water quality monitoring site across Makara and Ohariu's full 15,000 hectares and it only relates to the 8,000 hectare Makara	Take a farm-scale and catchment-scale approach, rather than whaitua-wide or across a "Freshwater Management Unit

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Stream catchment. Considers smaller streams located on Terawhiti have good water quality but stringent land use rules will still apply. Considers the proposed regulatory implications are wide-reaching, create social and financial cost, and risk not achieving the outcomes efficiently. Considers solutions are best achieved on-farm but that streams cross property boundaries an therefore must be part of a catchment-wide approach.	
S229.005	General comments	General comments - overall	Amend	Concerned that the PC1 provisions will result in non-compliances and subsequent prosecution within a short timeframe, noting that the transition time from current land uses is very short, considering the cost of implementation for farmers. Seeks for a collaborative approach to be taken rather than implementation of blanket regulation.	Take an approach based less on blanket rules, modelled scenarios and enforcement and more on empowering and partnering with the community.
S229.006	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Support	Is pleased to see that a range of financial support options for land retirement are proposed, including rates relief and would like to see this also include compensation if large-scale land retirement progresses. Also pleased to see the farm-scale approach promoted.	Prioritise this work prior to implementing new rules. Integrate farm-scale approach into PC1's sediment and erosion control policies and rules.
S229.007	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Amend	Considers the lack of local water quality monitoring data means GWRC has had to make assumptions based on modelling, which are not fit for purpose. Notes the lack of data also makes it difficult to see where the water quality is and what solutions to implement on farm.	Increase GWRC support for additional water quality monitoring activities in Mākara and Ohariu, including community-led.
S229.008	8 Whaitua Te Whanganui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and	Amend	Considers that the sources of E. coli must be known for each catchment to be addressed appropriately.	Add **"Identification of sources of e-coli specific to individual catchments".**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Escherichia coli from farming activities.			
S229.009	8 Whaitua Te Whanganui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Amend	Notes a lack of consistency with WH.P22 (nitrogen) and WH.P23 (sediment). Considers work to reduce E-coli levels should only target areas where e-coli is shown to be an issue and there is not currently sufficient monitoring data to determine the levels and sources of e-coli across the multiple catchments. Considers it inappropriate to extrapolate the results of one monitoring site. Seeks landowner farm-scale monitoring be provided for - including feedback loops to monitor the impact of actions.	Add **"Incorporate e-coli reduction in catchment context and farm plans, based on monitored data" - to allow a farm-scale approach as per nitrogen and sediment.**
S229.010	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	Considers PC1 mapping does not correspond well with ground-truthed information on erosion from landowners. Concerned about both the accuracy of the modelled scenarios and considers it is not fit for purpose in Mākara/Ohariu. Concerns the policy includes generic assumptions on the source of sediment and that the policy focuses on hill country erosion as a source of sediment and not streambank erosion in high flow events - anecdotally a much higher contributor to sediment loss. Supports revegetation of vulnerable areas of farms but suggests there are multiple options for revegetation sites that best work within the farm system. Considers the area forced into retirement will be much bigger than the red areas mapped due to the need to aggregate areas and work with the landscape to locate sensible fencelines.	Identify sediment sources by using a farm-scale assessment of sediment sources rather than the erosion-risk mapping. Refocus this section on identifying "sediment sources" rather than erosion risk land/pasture.
S229.011	8 Whaitua Te	Policy WH.P23: Achieving	Amend	There are likely more sources of erosion than from hillsides. Emphasised the role of other existing	Refocus from "erosion risk" to "sediment management".

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	reductions in sediment discharges from farming activities on land with high risk of erosion.		management techniques such as low stocking rates and good pasture cover.	
S229.012	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Oppose	Clause (c) Concerned this provision will financially cripple many farms given the large area, timeframes and requirement to retire the land. Using poplars and willows (alongside grazing) is unlikely to be successful on submitter's steepest areas given the high-wind nature of the landscape and based on trial work to date. Therefore fencing and retirement will be the only tool available. Native planting will not be affordable on this scale and natural reversion will take a very long time to establish, including a significant period through gorse, creating a seed source within farms. The provision's requirement to "maintain" the woody vegetation will be unviable, given the large-scale land retirement and reduced farm income from less productive land and high fencing costs incurred. Another challenge to revegetation is working alongside Meridian's wind farms (crossing six of the submitter's farms) where afforestation needs to be designed to not impede wind flow.'	Remove blanket approach and rely on the bespoke actions and timeframes that will be identified through farm-scale assessment, including via the audited Freshwater Farm Plans.
S229.013	8 Whaitua Te Whanganui-a-Tara	Policy WH.P26: Managing livestock	Amend	Support revegetating streams in theory but does not support this blanket rule due to the number of small streams, the costs, and the impracticality of fencing large swathes of land particularly with intersecting	Make consistent with the associated Rule regarding reduced access where practical rather than restricted access. Replace "restrict" with "reduce through non-regulatory

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		access to small rivers.		gullies that are flood zones, Considers farm-scale analysis of risk and solutions is critical - rather than blanket restrictions. Considers there is risk to animal welfare if livestock do not have access to streams for drinking water, due to standard risks of reticulated water supply infrastructure functioning well in hill country paddocks.	means ". Amend the policy wording to match the heading about river size.
S229.014	8 Whaitua Te Whanganui-a-Tara	Policy WH.P27: Promoting stream shading.	Amend	Recognises the value of riparian planting of natives and poplar/willows for shade where practical but notes planting to date has not been 100% successful due to the climate and wind conditions on the property.	Amend to "where economically practical to do so"
S229.015	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Amend	Considers that additional farm plan work is unnecessary when there is an existing similar process under national regulation.	Ensure that the details of this rule are consistent with the content and timing for Freshwater Farm Plans
S229.016	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Oppose	Recognises the value of riparian planting of natives and poplar/willows for shade where practical but notes planting to date has not been 100% successful due to the climate and wind conditions on the property.	Remove since this can be instead incorporate into certified/audited Freshwater Farm Plans as catchment context.
S229.017	8 Whaitua Te Whanganui-a-Tara	Rule WH.R29: Livestock access to a small river -	Oppose	Recognises the value of riparian planting of natives and poplar/willows for shade where practical but notes planting to date has not been 100% successful due to the climate and wind conditions on the property.	Remove since this can be instead incorporate into certified/audited Freshwater Farm Plans as catchment context.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discretionary activity.			

S231 Te Marama Ltd

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S231.001	General comments	General comments - overall	Oppose	Does not support Plan Change 1 in its current form	Not stated
S231.002	General comments	General comments - overall	Oppose	Oppose the regulatory approach.	Seek council to work with community rather than regulate against it.
S231.003	General comments	General comments - consultation	Not Stated	Concerned about lack of consultation.	Seeks additional forms of consultation are implemented by GWRC.
S231.004	General comments	General comments - economic cost/impact	Not Stated	Concerned cost implications on farms as a result of proposed changes will be very high and will significantly impact farm viability. Notes unlike PC1 changes that impact urban areas, the financial implications fall directly to individual landowners in rural communities. Considers PC1 does not give flexibility to stage work, unlike three waters work where many costs are dispersed through rates increases / council debt over time. Submitter expects the proposed changes will significantly devalue properties given high cost of implementation and reduction in farm incomes. Seeks that council first and foremost remove PC1's regulatory approach proposed. If this does not occur, then we expect council to provide a range of targeted support mechanisms to recognise the cost of implementation and to compensate for the ongoing loss of potential farm income.	Seeks removal of PC1's regulatory approach. If this does not occur, then expects council to provide a range of targeted support mechanisms to recognise the cost of implementation and to compensate for the ongoing loss of potential farm income.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S231.005	General comments	General comments - overall	Not Stated	Submitter notes insufficient information to know where water quality is a problem and notes no real data to show the source of these contaminants (both activity and location) or the natural state. Concerned about use of one water quality monitoring site for both the Ohariu and Makara catchments. Considers PC1 addresses the lack of local water quality information by bluntly proposing broad rules across multiple catchments instead of seeking to target interventions for the best outcomes. Considers the proposed regulatory implications are wide-reaching, create huge social and financial cost and risk not achieving the outcomes efficiently.	Seeks GWRC take a farm-scale and catchment-scale approach, rather than whaitua-wide or across a "Freshwater Management Unit" to acknowledge that solutions are best achieved on-farm but that streams cross property boundaries and therefore must be part of a catchment-wide approach.
S231.006	General comments	General comments - overall	Not Stated	Concerned scale of PC1 provisions means many people will be non-compliant within a short timeframe and find themselves faced with prosecution. Considers transition time between current land use and implementing the proposed changes is very short considering the huge financial implications, farm system change required and land use change required.	Seeks GWRC take an approach based less on blanket rules, modelled scenarios and enforcement and more on empowering and partnering with the community.
S231.007	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Support	Supports range of financial support options for land retirement (including rates relief) and the farm-scale approach being promoted.	Seeks farm scale approach is better integrated into PC1's sediment and erosion control policies and rules and seeks financial compensation if large-scale land retirement progresses.
S231.008	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Amend	Considers lack of local water quality monitoring data means GWRC has had to make assumptions based on modelling, which submitter considers are not fit for purpose. Notes lack of data also makes it difficult for submitter to see where the water quality is and what solutions are required.	GWRC provide more support for additional water quality monitoring activities in Makara and Ohariu, including community-led

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S231.009	8 Whaitua Te Whanganui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Amend	Notes lack of consistency with WH.P22 and WH.P23 and notes not enough sufficient monitoring data to determine the levels and sources of e-coli across the multiple catchments. Considers it inappropriate to extrapolate results of one monitoring site across all of Mākara and Ohariu, given differences in catchments/sub-catchment. Considers local water quality studies need to be carried out and the option for landowner farm-scale monitoring provided for - including feedback loops to monitor the impact of actions.	Add wording: "Incorporate e-coli reduction in catchment context and farm plans, based on monitored data" - to allow a farm-scale approach as per nitrogen and sediment.
S231.010	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	Concerned about accuracy of the modelled scenarios and mapping, particularly with soil types. Considers modelling coarse and not fit for purpose in Mākara/Ohariu. Concerned that policy focuses on hill country erosion as a source of sediment and not streambank erosion in high flow events - anecdotally a much higher contributor to sediment loss. Supports revegetation of vulnerable areas of farms in order to reduce flood flows and streambank erosion - but notes there are multiple options for revegetation sites that best work within the farm system. Considers areas forced into retirement will be larger than anticipated due to need to aggregate areas and work with the landscape to locate sensible fencelines.	Identify sediment sources by using a farm-scale assessment of sediment sources rather than the erosion-risk mapping in PC1. Refocus section on identifying "sediment sources" rather than erosion risk land/pasture.
S231.011	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in	Support	Considers sources of sediment are likely broader than erosion on hillsides. Notes this will help acknowledge other existing sediment management techniques such as low stocking rates and good pasture cover.	Refocus from "erosion risk" to "sediment management".

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		sediment discharges from farming activities on land with high risk of erosion.			
S231.012	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Oppose	Notes provision will financially cripple many farms given large area, timeframes and requirement to retire land. Concerns with requirements to revegetate land within short timeframes. Considers woody vegetation will need to be natural reversion and is unlikely to be successful and fencing and retirement will be the only tool available. Notes the provision's requirement to "maintain" the woody vegetation will be unviable, given the large-scale land retirement and reduced farm income from less productive land and high fencing costs incurred. Notes additional challenges with the wind farms and revegetation needing not to impede wind flows. The policy relies on modelling that submitter considers is inaccurate. Concerns it makes no sense to retire farmland where there is no erosion issue.	Remove blanket approach and rely on bespoke actions and timeframes identified through farm-scale assessment, including via the audited Freshwater Farm Plans.
S231.013	8 Whaitua Te Whanganui-a-Tara	Policy WH.P26: Managing livestock access to	Amend	Supports revegetating streams in theory but does not support the blanket rule. Notes preference to Farm-scale analysis of risk and solutions rather than blanket restrictions. Notes risk to increased animal welfare issues if livestock do	Replace "restrict" with "reduce through non-regulatory means ". Amend the policy wording to match the heading about river size.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		small rivers.		not have access to streams for drinking water, due to standard risks of reticulated water supply infrastructure functioning well in hill country paddocks. A farm-scale approach needs to be supported to help deliver solutions such as sediment retention / stockwater ponds and for policy to be consistent with the associated Rule regarding reduced access where practical rather than restricted access.	
S231.014	8 Whaitua Te Whanganui-a-Tara	Policy WH.P27: Promoting stream shading.	Support	Notes value of riparian planting of natives and poplar/willows for shade where practical but notes concerns about success due to potential issues with climate and wind conditions.	Amend to "where economically practical to do so"
S231.015	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Amend	Considers this a double-up as existing processes are already in play under national regulation.	Ensure details of this rule are consistent with content and timing for Freshwater Farm Plans
S231.016	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Oppose	Supports revegetating streams in theory but does not support the blanket rule. Notes preference to Farm-scale analysis of risk and solutions rather than blanket restrictions. Notes risk to increased animal welfare issues if livestock do not have access to streams for drinking water, due to standard risks of reticulated water supply infrastructure functioning well in hill country paddocks. A farm-scale approach needs to be supported to help deliver solutions such as sediment retention /	Remove rule as this can be instead incorporate into certified/audited Freshwater Farm Plans as catchment context.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				stockwater ponds and for policy to be consistent with the associated Rule regarding reduced access where practical rather than restricted access.	
S231.017	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Oppose	Supports revegetating streams in theory but does not support the blanket rule. Notes preference to Farm-scale analysis of risk and solutions rather than blanket restrictions. Notes risk to increased animal welfare issues if livestock do not have access to streams for drinking water, due to standard risks of reticulated water supply infrastructure functioning well in hill country paddocks. A farm-scale approach needs to be supported to help deliver solutions such as sediment retention / stockwater ponds and for policy to be consistent with the associated Rule regarding reduced access where practical rather than restricted access.	Remove rule as this can be instead incorporate into certified/audited Freshwater Farm Plans as catchment context.

S216 Te Rūnanga o Toa Rangatira (Te Rūnanga)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S216.001	General comments	General comments - water bodies	Not Stated	Restoring the health of Te Awarua o Porirua and Te Whanganui a Tara are key priorities for the submitter	Provisions relating to the protection and restoration of Te Awarua o Porirua and Te Whanganui a Tara should be confirmed, adopted and implemented.
S216.002	General comments	General comments - fresh water	Support	Te Rūnanga provided input into the draft plan change including matters relating to Māori rights and interests to freshwater; Te Mana o Te Wai under the NPS-FM; mahinga kai as a highly significant value; and timeframes for E.coli target attribute states and the enterococci coastal water objectives.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Supports the proposed objectives and policies in the plan change which sets new direction to restoring rivers, lakes, natural wetlands for contact recreation and Māori customary use.	
S216.003	General comments	General comments - overall	Not Stated	Considers the Te Whanganui a Tara and Te Awarua o Porirua planning frameworks implement the NPS-FM, the Ngāti Toa Statement on the Te Awarua o Porirua Whaitua and Te Mahere Wai for the Te Whanganui a Tara Whaitua. Considers for the first time cultural health of Te Awarua o Porirua and Te Whanganui a Tara is of central importance and there is a pathway towards wai ora involving respect for taonga, restoration of mauri, ecological health, mahinga kai and kaimoana	Not stated
S216.004	General comments	General comments - overall	Not Stated	Considers the new provisions set new targets and standards for coastal water, nationally threatened freshwater species, groundwater, water quality, habitats, water quantity, and ecological processes of rivers. Submitter is committed to working with the local authorities and Wellington Water Ltd to make these targets achievable especially in relation to stormwater and wastewater discharge consents.	Not stated
S216.005	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	Considers the intention of Policy WH.P2(a), Policy WH P.P15 and associated provisions is to restrict urban development that is ad hoc and uncoordinated to minimise water quality impacts, lack of stormwater infrastructure and other environmental effects. Supports a dedicated planning approach to development in the Wellington Region. Considers urban sprawl should be avoided when it results in poor environmental outcomes. Considers there a need to clarify the provisions relating to 'unplanned greenfield development' and the type of activities	Clarify the provisions relating to 'unplanned greenfield development' and the type of activities that would be captured by this rule and the appropriate rule category. Submits that the plan change should be amended to provide a more balanced and nuanced approach with regard to managing the tension between restricting urban sprawl and provision for practical flexibility for development in nonurban areas. Amend WH.P2(a) to state: **Restricting** ~~prohibiting~~ unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				captured by this rule and the appropriate rule category. Notes that Under the Ngāti Toa Rangatira Deed of Settlement Act 2014, land has been returned or acquired by Ngāti Toa Rangatira under the Right of First Refusal or other processes. These lands may involve historical legacy zones or activities which have been inherited from previous owners or land uses, such as former education and corrections facilities. Considers while new development will aim to achieve high standards of wastewater and stormwater disposal in terms of Water Sensitive Urban Design systems, there could be unanticipated challenges relating to existing (historical) infrastructure, buildings and related additions or alterations that may trigger the unplanned greenfield development rule. Considers similar issues may exist for areas where resource consents have been granted for activities in unplanned greenfield development areas but the zoning has yet to reflect existing activity. For example, upgrades to facilities in rural areas that could trigger the unplanned greenfield development rule. Notes this upgrades may not justify the expense and time of a private plan change process. Considers a strong alignment between the provisions of the district plans and NRP is needed when signalling land that may potentially become part of future urban development areas. For example, the NPR maps 86-89 may become 'out of date' due to district plan reviews. Considers this may require a two plan change process (an update to the relevant maps of the NRP and the district plan zoning).	

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S216.006	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development – prohibited activity.	Amend	Considers a non-complying rule is more appropriate to regulate stormwater discharges which may enter a surface water body or coastal water when the land has not been zoned for urban development.	Change to rule WH.R13 to classify the relevant activity as non-complying instead of prohibited.
S216.007	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Amend	Considers the intention of Policy WH.P2(a), Policy WH P.P15 and associated provisions is to restrict urban development that is ad hoc and uncoordinated to minimise water quality impacts, lack of stormwater infrastructure and other environmental effects. Supports a dedicated planning approach to development in the Wellington Region. Considers urban sprawl should be avoided when it results in poor environmental outcomes. Considers there a need to clarify the provisions relating to 'unplanned greenfield development' and the type of activities captured by this rule and the appropriate rule category. Notes that Under the Ngāti Toa Rangatira Deed of Settlement Act 2014, land has been returned or acquired by Ngāti Toa Rangatira under the Right of First Refusal or other processes. These lands may involve historical legacy zones or activities which have been inherited from previous owners or land uses, such as former education and corrections facilities. Considers while new development will aim to achieve high standards of wastewater and stormwater disposal in terms of Water Sensitive Urban Design systems, there could be unanticipated challenges relating to existing (historical) infrastructure, buildings and related	Clarify the provisions relating to 'unplanned greenfield development' and the type of activities that would be captured by this rule and the appropriate rule category. Submits that the plan change should be amended to provide a more balanced and nuanced approach with regard to managing the tension between restricting urban sprawl and provision for practical flexibility for development in nonurban areas. Amend WH.P2(a) to state: **Restricting** ~~prohibiting~~ unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				additions or alterations that may trigger the unplanned greenfield development rule. Considers similar issues may exist for areas where resource consents have been granted for activities in unplanned greenfield development areas but the zoning has yet to reflect existing activity. For example, upgrades to facilities in rural areas that could trigger the unplanned greenfield development rule. Notes this upgrades may not justify the expense and time of a private plan change process. Considers a strong alignment between the provisions of the district plans and NRP is needed when signalling land that may potentially become part of future urban development areas. For example, the NPR maps 86-89 may become 'out of date' due to district plan reviews. Considers this may require a two plan change process (an update to the relevant maps of the NRP and the district plan zoning).	
S216.008	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 – Stormwater discharges from new unplanned greenfield development – prohibited activity.	Amend	Considers a non-complying rule is more appropriate to regulate stormwater discharges which may enter a surface water body or coastal water when the land has not been zoned for urban development.	Change to rule P.R12 to classify the relevant activity as non-complying instead of prohibited.

S224 Terawhiti Farming Co Ltd

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S224.001	General comments	General comments - overall	Not Stated	Does not support the Plan Change 1 in its current form and opposes the broadbrush regulatory approach taken and the removal of local decision making. Agrees with the need to improve water quality - where it is poor and where the solutions are within our control - but considers fundamental information is required to do this effectively and equitably. Asks council to recognise the work the submitter has done to date and partner with us in this work rather than regulate us.	Not stated
S224.002	General comments	General comments - consultation	Oppose	Concerned with a lack of consultation, content which is difficult for most people to understand, short timeframes to make submissions, and the submission timing just prior to Christmas. Notes opportunities that were missed that would have helped engagement, including: a.Direct mail contact with rural property owners, identified through council's rating database. b.Formal engagement with our Community Board; and c.Provision of information on the GWRC website - more accessible written information, invitation to the PC1 rural webinars/meeting. Additional forms of communication are essential if GWRC really wants meaningful community feedback.	Not stated
S224.003	General comments	General comments - economic cost/impact	Amend	Considers the cost of implementing the proposed changes on farms will be very high and will significantly impact farm viability as financial implications fall directly to individual landowners in rural communities. Considers the Plan Change lacks the flexibility to stage work. Considers the proposed changes will significantly devalue properties.	Remove PC1's regulatory approach. or provide a range of targeted support mechanisms to recognise the cost of implementation and to compensate for the ongoing loss of potential farm income.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S224.004	General comments	General comments - overall	Amend	Considers there is not sufficient information to know where water quality is a problem are and therefore how to effectively target work and PC1 proposes broad rules across multiple catchments instead of seeking to target interventions for the best outcomes. Notes there is only one water quality monitoring site across Makara and Ohariu's full 15,000 hectares and it only relates to the 8,000 hectare Makara Stream catchment. Considers smaller streams located on Terawhiti have good water quality but stringent land use rules will still apply. Considers the proposed regulatory implications are wide-reaching, create social and financial cost, and risk not achieving the outcomes efficiently. Considers solutions are best achieved on-farm but that streams cross property boundaries an therefore must be part of a catchment-wide approach.	Take a farm-scale and catchment-scale approach, rather than whaitua-wide or across a "Freshwater Management Unit
S224.005	General comments	General comments - overall	Amend	Concerned that the PC1 provisions will result in non-compliances and subsequent prosecution within a short timeframe, noting that the transition time from current land uses is very short, considering the cost of implementation for farmers. Seeks for a collaborative approach to be taken rather than implementation of blanket regulation.	Take an approach based less on blanket rules, modelled scenarios and enforcement and more on empowering and partnering with the community.
S224.006	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Support	Supports financial support and rates relief for land retirement. Seeks for compensation for large-scale land retirement be included. Supports the farm-scale approach proposed.	Prioritise this work prior to implementing new rules. Integrate farm-scale approach into PC1's sediment and erosion control policies and rules.
S224.007	6 Other methods	Method M44: Supporting the health of rural	Amend	Considers the lack of local water quality monitoring data means GWRC has had to make assumptions based on modelling, which are not fit for purpose. Notes the lack of data also makes it difficult to see where the water quality is and what solutions to implement on farm.	Increase GWRC support for additional water quality monitoring activities in Mākara and Ohariu, including community-led.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		waterbodies.			
S224.008	8 Whaitua Te Whanganui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Amend	Considers that the sources of E. coli must be known for each catchment to be addressed appropriately.	Add **"Identification of sources of e-coli specific to individual catchments".**
S224.009	8 Whaitua Te Whanganui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Amend	Notes a lack of consistency with WH.P22 (nitrogen) and WH.P23 (sediment). Considers work to reduce E-coli levels should only target areas where e-coli is shown to be an issue and there is not currently sufficient monitoring data to determine the levels and sources of e-coli across the multiple catchments. Considers it inappropriate to extrapolate the results of one monitoring site. Seeks landowner farm-scale monitoring be provided for - including feedback loops to monitor the impact of actions.	Add **"Incorporate e-coli reduction in catchment context and farm plans, based on monitored data"**
S224.010	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high	Amend	Considers PC1 mapping does not correspond well with ground-trothed information on erosion from landowners. Concerned about both the accuracy of the modelled scenarios and considers it is not fit for purpose in Mākara/Ohariu. Concerns the policy includes generic assumptions on the source of sediment and that the policy focuses on hill country erosion as a source of sediment and not streambank erosion in high flow events - anecdotally a much higher contributor to sediment loss. Supports revegetation of vulnerable areas of farms but suggests there are multiple	Identify sediment sources by using a farm-scale assessment of sediment sources rather than the erosion-risk mapping. Refocus this section on identifying "sediment sources" rather than erosion risk land/pasture.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		risk of erosion.		options for revegetation sites that best work within the farm system. Considers the area forced into retirement will be much bigger than the red areas mapped due to the need to aggregate areas and work with the landscape to locate sensible fencelines.	
S224.011	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	There are likely more sources of erosion than from hillsides. Emphasised the role of other existing management techniques such as low stocking rates and good pasture cover.	Refocus from "erosion risk" to "sediment management".
S224.012	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Oppose	Concerned about the timeframe for transitioning to woody vegetation and how long it will take for vegetation to establish given conditions at this location. Expressed concern about cost of maintaining woody vegetation and potential for growth of pest plants. Mentioned potential conflict between revegetation and nearby windfarms. Considers that the modelling is inaccurate and that retirement of farmland should not be required where there are no erosion issues.	Remove blanket approach and rely on the bespoke actions and timeframes that will be identified through farm-scale assessment, including via the audited Freshwater Farm Plans.
S224.013	8 Whaitua Te	Policy WH.P26: Managing	Amend	Support revegetating streams in theory but does not support this blanket rule due to the number of small streams, the costs, and the impracticality of fencing	Make consistent with the associated Rule regarding reduced access where practical rather than restricted access.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	livestock access to small rivers.		large swathes of land particularly with intersecting gullies that are flood zones, Considers farm-scale analysis of risk and solutions is critical - rather than blanket restrictions. Considers there is risk to animal welfare if livestock do not have access to streams for drinking water, due to standard risks of reticulated water supply infrastructure functioning well in hill country paddocks.	Replace "restrict" with "reduce through non-regulatory means ". Amend the policy wording to match the heading about river size.
S224.014	8 Whaitua Te Whanganui-a-Tara	Policy WH.P27: Promoting stream shading.	Amend	Recognises the value of riparian planting of natives and poplar/willows for shade where practical but notes planting to date has not been 100% successful due to the climate and wind conditions on the property.	Amend to "where economically practical to do so"
S224.015	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Amend	Considers that additional farm plan work is unnecessary when there is an existing similar process under national regulation.	Ensure that the details of this rule are consistent with the content and timeframes for Freshwater Farm Plans.
S224.016	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Oppose	Recognises the value of riparian planting of natives and poplar/willows for shade where practical but notes planting to date has not been 100% successful due to the climate and wind conditions on the property.	Remove since this can be instead incorporate into certified/audited Freshwater Farm Plans as catchment context.
S224.017	8 Whaitua Te Whanganui-a-Tara	Rule WH.R29: Livestock access to a small river -	Oppose	Recognises the value of riparian planting of natives and poplar/willows for shade where practical but notes planting to date has not been 100% successful due to the climate and wind conditions on the property.	Remove since this can be instead incorporate into certified/audited Freshwater Farm Plans as catchment context.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discretionary activity.			

S252 Thames Pacific

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S252.001	General comments	General comments - definitions	Amend	Considers without a definition, there may be uncertainty about what constitutes a greenfield development in comparison to an infill/brownfield development. Considers a definition of 'greenfield' development would assist in providing certainty regarding the application of new rules. Considers the proposed definition of 'greenfield' development aligns with the definition of an urban environmental allotment under section 76(4C) of the RMA. Suggests this definition will not hinder the ability of large lots to accommodate the establishment of up to 2 dwellings, which is permitted by most District Plans in the region.	Add definition of greenfield development: **Greenfield Development: The use of land that is predominately vacant with a site area of 4,000m² or greater, where the proposal will result in the development of 3 of more lots or dwellings for residential purposes regardless of staging.**
S252.002	General comments	General comments - overall	Oppose	Supports initiatives to improve the quality of freshwater and the state of freshwater and coastal environments. Considers PC1 will have significant financial impacts particularly on pre-committed development projects Opposes PC1 in its current form and requests it be withdrawn to allow for genuine consultation to occur, consideration of matters raised through this submission process, and consideration of the new direction from the central Government.	Withdraw PC1

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers PC1 does not provide sufficient certainty or clarity in the implementation of rules Considers PC1 will have significant financial impacts particularly on pre-committed development projects Considers PC1 will hinder growth through the prohibition of unplanned greenfield development	
S252.003	General comments	General comments - urban development	Oppose	Considers PC1 potentially conflicts with the intended outcomes of the NPS-UD to provide for well-functioning urban environments, including both through infill, and greenfield developments. Notes Policy 6 requires planning decisions that affect urban environments to consider the benefits of urban development and the contributions that development makes to provide or realise development capacity, and this has not been sufficiently considered in PC1 as economic impacts have not been assessed.	Withdraw PC1
S252.004	General comments	General comments - consultation	Oppose	Considers adequate consultation was not carried out with the development community and is concerned the draft version was not sent to the development community despite Subpart 1 of the NPS-FM requiring regional councils to engage with communities and tangata whenua. Considers that given the impact and extent of the proposed changes, the publication of a draft plan and consultation with the development community would minimise potential appeals and aid towards a more workable and functioning Natural Resources Plan.	Withdraw PC1
S252.005	General comments	General comments -	Oppose	Considers GWRC should wait to see what changes to the NPS-FM are proposed by the new government coalition to ensure PC1 is in alignment.	Withdraw PC1

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		consultation		Considers PC1 was rushed as the plan does not need to be notified until 31st December 2024. Considers the imposition of new rules with immediate legal effect is inconsistent with subpart 1 of the NPS-FM as there is still a significant amount of time before the plan change has to be notified.	
S252.006	2 Interpretation	Hydrological control	Amend	Suggests the hydrological control definition should be expanded to include reference to the measures proposed to manage the flows and volumes and an acceptable solution that is easily and commonly able to be implemented. Considers the current definition does not provide certainty regarding the rate or degree to which hydrological controls need to be implemented on-site and whilst there is mention throughout PC1 on retention, there is no definition as to an acceptable volume of water that needs to be provided for. Considers permitted activity standards (and the supporting definitions) should be clear and easy to understand without any ambiguity. References Table E10.6.3.1.1 of the Auckland Unitary Plan which contains hydrological controls. Notes a 5mm runoff depth has been used in the decision sought but recommends GWRC complete modelling to determine the runoff depth for each catchment as sensitivity to volume changes will vary between catchments. Suggests technical standards could also be referenced.	Request the following to the definition be added : **Management measures may include:** **a) Rapid Infiltration devices such as soak pits;** **b) Permeable paving; or** **c) Rainwater retention tanks which:** **i) are plumbed into the toilet and/or an outdoor tap or taps; and** **ii) where connected to toilets, are capable of being topped up by potable water supply to a maximum volume of 100L.** **Where these measures provide a minimum retention volume of 5mm runoff depth over the impervious area which hydrology controls are required; and** **Provide detention (temporary storage) for the difference between the predevelopment and post-development runoff volumes from the 95th percentile, 24 hour rainfall event minus the 5 mm retention volume or any greater retention volume that is achieved, over the impervious area for which hydrology mitigation is required (unless further detention or infiltration measures are utilised downstream).** **Note:** **Compliance with the definition can be demonstrated by installing a rainwater tank in accordance with Approved Solution #1 of Wellington Water's Managing Stormwater Runoff Version 4 June 2023**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S252.007	2 Interpretation	Redevelopment	Amend	Considers the definition should exclude minor alterations and additions to existing buildings to provide for the small redevelopment of existing sites as a permitted activity in associated rules. Notes the suggested 30m² amendment aligns with recent changes to the Building Regulations for sheds to avoid consenting requirements.	Amend definition and make any other consequential amendments necessary to give effect to this submission point, to provide for small scale alterations and additions to existing buildings: For the purpose of assessment of a proposal involving the redevelopment of an existing urbanised property (i.e including brownfield development upgrades to existing roads etc.) in relation to stormwater effects. this includes the replacement, reconstruction or addition (new) of impervious surfaces. Excludes: -minor maintenance or repairs to roads, carparking areas, driveways and paving -installation, maintenance or repair of underground infrastructure or network utilities requiring trenching and resurfacing -activities that only involve the re-roofing of existing buildings**-New buildings or alterations and additions to existing buildings of less than 30m²**
S252.008	2 Interpretation	Unplanned greenfield development	Oppose	Opposes the proposed prohibited activity rules. Considers the current provisions would make rezoning more costly, and take longer as they would require a plan change to a District Plan and the Natural Resource Plan. Considers that in some instances resource consent is more appropriate than a plan change. For example, when the size of the site or development is not such that a plan change is economically viable, or the effects are discrete and localised making a resource consent process more appropriate. Considers other proposed rules within PC1 that apply greenfield development adequately address effects on water quality without needing to prohibit development.	Requests the deletion of this definition and all subsequent references to unplanned greenfield development. ~~Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 which also require an underlying zone change (from rural/nonurban/ open space to urban) though a District Plan change to enable the development.~~ ~~Note: Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023.~~ ~~Amend definition to align with zones under a District Plan and avoid a plan change to both District and Regional Plans:~~ Should the above relief not be obtained, submitter seeks the following revision: Greenfield development within areas~~ identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89~~ **not zoned as urban within a District Plan**~~. which also require an underlying zone change (from rural/nonurban/open space~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					~~to urban) though a District Plan change to enable the development.~~ Note: Unplanned greenfield areas are **identified on maps 86, 87, 88 and 89** ~~those areas~~ **and include those areas** that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023. And consequential amendments to other references or policies as needed to align with the above amendment.
S252.009	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Oppose	Opposes prohibited policy and rules. Concerned prohibiting activities can lead to perverse outcomes (experienced with the NES-FW) as there is no consenting pathway to consider proposals that have a net positive impact on the environment, including freshwater and coastal systems.	Amend policy to remove reference to prohibiting unplanned greenfield development. (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,~~
S252.010	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Considers there will be instances where it is not practicable to achieve hydrological controls i.e. when retention is not possible and there are low infiltration rates, more water will be discharged to a water network, even though the peak flows are being contained. Considers source control measures should be included in this policy as they are a way of reducing copper and zinc loads.	Amend policy wording to remove (b) and replace.~~(b) where stormwater discharges will enter a river, hydrological controls either on-site, or off-site via a communal stormwater treatment system~~**(b) Source control techniques that result in copper and zinc load reductions equal to or greater than what would be achieved through on-site or communal stormwater treatment systems or devices designed in accordance with (a).**
S252.011	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned	Oppose	Opposes use of the term "avoid". Opposes the requirement to seek two separate plan changes if land is to be rezoned.	Request policy is deleted. ~~Policy WH.P16: Stormwater discharges from new unplanned greenfield development Avoid all new stormwater discharges from unplanned greenfield development where the discharge will enter a surface water body or coastal water, including through an existing local authority stormwater network.~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		greenfield developm ent.			
S252.012	8 Whaitua Te Whangan ui-a-Tara	Policy WH.P31: Winter shut down of earthwork s.	Oppose	Opposes the requirement for non-complying resource consent to undertake winter earthworks. Notes high rainfall events can occur during any time of the year, and during summer months when the ground is less permeable, it is just as likely that sediment control measures will fail. In some soil conditions (i.e. sand, river gravels) it is preferable works occur when the ground is wet because it reduces the potential for sediment to be blown into waterways. Considers the s32 report fails to justify why this measure is required. Considers the current method of site-specific assessments during winter works in achieving the objectives of the NPS-FW.	Delete policy and related rules. ~~Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).~~
S252.013	8 Whaitua Te Whangan ui-a-Tara	Rule WH.R2: Stormwate r to land - permitted activity.	Amend	Considers connections to or from a local authority stormwater network should be managed by the local authority rather than by resource consent.	Amend Rule WH.R2 to better reflect the requirements for individual properties. Rule WH.R2: Stormwater to land - permitted activity The discharge of stormwater onto or into land, including where contaminants may enter groundwater: (a) that is not from a high risk industrial or trade premise, or (b) that **does not connect to** ~~does not discharge from, or to,~~ a local authority stormwater network, is a permitted activity provided the following conditions are met:
S252.014	8 Whaitua Te Whangan ui-a-Tara	Rule WH.R3: Stormwate r from an existing individual	Amend	Considers connections to or from a local authority stormwater network should be managed by the local authority rather than by resource consent.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		property to surface water or coastal water - permitted activity.			The discharge of stormwater from an existing individual property into water, or onto or into land where it may enter a surface water body or coastal water, (a) that is not from a high risk industrial or trade premise, or (b) that is not from a port, airport or state highway, or (c) that **does not connect to** ~~does not discharge from, or to,~~ a local authority stormwater network, is a permitted activity, provided the following conditions are met:
S252.015	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	The submitter seeks an 'effectual' amnesty from the rules for all pre-committed projects. Considers the new rules will add costs to committed development projects that haven't been factored into the development costs of project viability. Concerned the immediate legal effect of new rules may adversely affect the viability of committed development projects, as the decision to purchase and proceed with development was undertaken without consideration of PC1. Disagrees with the new rules having immediate legal effect in accordance with Part 2 of the RMA as it does not provide for all three principles of sustainable management which must include economic well-being. Considers the new rules will have significant costs associated with: - Re-design to retrofit stormwater quality treatment including consultant costs; - Construction of stormwater quality treatment devices - Resource consenting costs including the lodgement and processing of a consent or section 127 change of condition application and consultant costs. - Holding costs associated with delays in carrying	Amend Rule WH.R5 and make any consequential amendments to other references or policies as needed to enable pre-committed development projects to proceed without disrupting financial planning. Rule WH.R5.... - permitted activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or new local authority stormwater network, that is not a high risk industrial or trade premise or unplanned greenfield development, is a permitted activity, provided the following conditions are met:**(a) A local authority has accepted a resource consent application for the activity prior to 30 October 2024, or where resource consent was either not required under the Natural Resources Plan, or Greater Wellington Regional Council has accepted a resource consent application for the activity prior to 30 October 2024, and that resource consent is given effect to within 2 years of being granted; or** (b) The proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m² (baseline existing impervious area as at 30 October 202~~3~~**4**); and (c) all new building materials associated with the development shall not include exposed zinc (including galvanised steel) or copper roof, cladding and spouting materials, and

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				out development. - Compliance and Monitoring costs associated with resource consent conditions; - Legal costs, particularly where lots or development has been sold off the plan, and design changes are necessary to accommodate stormwater quality treatment and hydrological controls; - Development contributions applicable to greenfield development. considers the above costs are substantial, and may render projects infeasible. Outlines that the immediate imposition of new rules and associated costs, have not been priced in and will provide uncertainty on the viability of many projects. Considers projects that already have resource consent from a local authority will be the greatest impacted. Requests that whilst under section 86A of the RMA, the rules have immediate legal effect, the rule be written to have a later effectual legal effect. Considers the suggested amendments to Rule WH-R5 would allow sufficient time for pre-committed projects without resource consent to proceed with confidence, and allow pre-consented projects to proceed without design changes or additional consenting costs until their lapse period (typically 5 years). Considers if the new rules are applied to new projects from November 2024 onwards, they can be accounted for in the investment decision, thereby achieving the purpose of the NPS-FM without putting projects at risk of not proceeding.	(d) the proposal provides hydrological control measures (for example **rapid infiltration devices, permeable paving, or water re-use** ~~rain~~ tanks) onsite or offsite, where discharges will enter a surface water body (including via an existing local authority stormwater network): (e) for all impervious areas associated with a greenfield development, or (f) for all redeveloped and new impervious areas involving greater than 30m2 of impervious area of a redevelopment (of an existing urbanised property), and (g) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (h) the discharge does not contain wastewater, and (i) the concentration of total suspended solids in the discharge shall not exceed: (j) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (k) 100g/m3 where the discharge enters any other water, and where the discharge is not via an existing or new local authority stormwater network: (l) the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (m) the discharge shall not give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than (n) 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (o) 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Requests the addition of a sunset clause stating 'given effect to within 2 years' aligning with the lapse period under the COVID-19 Recovery (Fast-track Consenting) Act 2020 so the effectual amnesty would apply to projects that are intended to develop within a reasonable timeframe, rather than applying to projects that want to hold or land bank development. Considers the added sunset clause will provide confidence in the delivery of pre-committed projects which will aid in providing additional housing under the NPS-UD. Seeks to include other means of hydrological control in the rule, refer to hydrological control definition above. Requests that whilst under section 86A of the RMA, the rules have immediate legal effect, the rule be written to have a later effectual legal effect. Considers the suggested amendments to Rule WH-R5 would allow sufficient time for pre-committed projects without resource consent to proceed with confidence, and allow pre-consented projects to proceed without design changes or additional consenting costs until their lapse period (typically 5 years). Considers that if new rules apply new projects from November 2024 onwards, they can be accounted for in the investment decision, thereby achieving the purpose of the NPS-FM without putting projects at risk of not proceeding. Requests the addition of a sunset clause of 'given effect to' within 2 years, aligning with the lapse period under the COVID-19 Recovery (Fast-track Consenting) Act 2020 so the effectual amnesty	animals, or (vi) any significant adverse effects on aquatic life.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				would apply to projects that are intended to develop within a reasonable timeframe, rather than applying to projects that want to hold or land bank development. Considers the added sunset clause will provide confidence in the delivery of pre-committed projects which will aid in providing additional housing under the NPS-UD. Seeks to include other means of hydrological control in the rule, refer to hydrological control definition above.	
S252.016	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Considers the timing should align with the feedback provided for Rule WH.R5. Add to a controlled activity recognition of circumstance where hydrological control cannot be achieved.	Amend wording to reference 2024, not 2023 (a) the proposal involves the creation of new impervious surfaces of between 1,000m2 and 3,000m2 (baseline property existing impervious area as at 30 October 20~~3~~**4**)
S252.017	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Amend	Considers the timing should align with the feedback provided for Rule WH.R5	Amend wording to reference 2024, not 2023 (a) the proposal involves the creation of new impervious surfaces of between 1,000m2 and 3,000m2 (baseline property existing impervious area as at 30 October 202~~3~~**4**)
S252.018	8 Whaitua Te	Rule WH.R13:	Oppose	Opposes the prohibited policy and rules.	Delete and reword rule as follows.~~Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	Stormwater from new unplanned greenfield development - prohibited activity.		Concerned prohibiting activities can lead to perverse outcomes as there is no consenting pathway to consider a proposal that could have a net positive impact on the environment including freshwater and coastal systems. Refers to their rationale on Unplanned Greenfield Development.	~~activity~~ ~~The use of land and the associated discharge of stormwater from impervious surfaces from unplanned greenfield development direct into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or proposed stormwater network, is a prohibited activity.~~ Should the above relief not be obtained, we seek: Rule WH.R13: Stormwater from new unplanned greenfield development ~~-prohibited activity~~ **discretionary activity**
S252.019	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	Opposes the requirement to seek a non-complying resource consent to undertake winter earthworks. Submitter notes that as high rainfall events can occur during any time of the year, and during summer months when the ground is less permeable, it is just as likely that sediment control measures will fail. Considers the proposed approach to be inappropriate as in some soil conditions (i.e. sand, river gravels) it is preferable works occur when the ground is wet. This is because it reduces the potential for sediment to be blown into waterways. The submitter suggests this is a position shared by GWRC's technical advisors. considers the s32 report fails to justify why this measure is required. Considers the current method of site-specific assessments during winter works in achieving the objectives of the NPS-FW.	Amend rule to as follows. Rule WH.R24: Earthworks - restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, ~~and~~ ~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~
S252.020	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities	Oppose	Opposes prohibited policy and rules. Concerned prohibiting activities can lead to perverse outcomes (experienced with the NES-FW) as there is no consenting pathway to consider	Request policy is amended to remove reference to prohibiting unplanned greenfield development. wording proposed is as follows: (a) ~~prohibiting unplanned greenfield development and for~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		to achieve target attribute states and coastal water objectives.		proposals that have a net positive impact on the environment, including freshwater and coastal systems.	~~other greenfield developments~~ minimising ~~the~~ contaminants **from greenfield developments** ~~and requiring financial contributions as to offset adverse effects from residual stormwater contaminants,~~
S252.021	9 Te Awarua-o-Porirua Whaitua	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Considers there will be instances where it is not practicable to achieve hydrological controls i.e. when retention is not possible and there are low infiltration rates, more water will be discharged to a water network, even though the peak flows are being contained. Considers source control measures should be included in this policy as they are a way of reducing copper and zinc loads.	Submitter refers to proposed amendment on policy WH.P13 (note no amendment to policy WH.P13 was provided within the submission)
S252.022	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Oppose	Opposes use of the term "avoid". Opposes the requirement to seek two separate plan changes if land is to be rezoned.	Submitter refers to response to policy WH.P15 (note no amendment to policy WH.P15 was provided within the submission)
S252.023	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose	Opposes the requirement for non-complying resource consent to undertake winter earthworks. Notes high rainfall events can occur during any time of the year, and during summer months when the ground is less permeable, it is just as likely that sediment control measures will fail. In some soil conditions (i.e. sand, river gravels) it is preferable works occur when the ground is wet because it reduces the potential for sediment to be blown into	Delete policy and related rules. ~~Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				waterways. Considers the s32 report fails to justify why this measure is required. Considers the current method of site-specific assessments during winter works in achieving the objectives of the NPS-FW.	
S252.024	9 Te Awarua-o-Porirua Whaitua	Rule P.R2: Stormwater to land - permitted activity.	Amend	Considers connections to or from a local authority stormwater network should be managed by the local authority rather than by resource consent.	Submitter refers to proposed amendment to policy WH.R2
S252.025	9 Te Awarua-o-Porirua Whaitua	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Amend	Considers connections to or from a local authority stormwater network should be managed by the local authority rather than by resource consent .	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity The discharge of stormwater from an existing individual property into water, or onto or into land where it may enter a surface water body or coastal water, (a) that is not from a high risk industrial or trade premise, or (b) that is not from a port, airport or state highway, or (c) that does not connect to ~~does not discharge from, or to,~~ a local authority stormwater network, is a permitted activity, provided the following conditions are met:
S252.026	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	The submitter seeks an 'effectual' amnesty from the rules for all pre-committed projects. Considers the new rules will add costs to committed development projects that haven't been factored into the development costs of project viability. Concerned the immediate legal effect of new rules may adversely affect the viability of committed development projects, as the decision to purchase and proceed with development was undertaken	Submitter refers to their proposed amendment to Policy WH.R3.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				without consideration of PC1. Disagrees with the new rules having immediate legal effect in accordance with Part 2 of the RMA as it does not provide for all three principles of sustainable management which must include economic well-being. Considers the new rules will have significant costs associated with: - Re-design to retrofit stormwater quality treatment including consultant costs; - Construction of stormwater quality treatment devices - Resource consenting costs including the lodgement and processing of a consent or section 127 change of condition application and consultant costs. - Holding costs associated with delays in carrying out development. - Compliance and Monitoring costs associated with resource consent conditions; - Legal costs, particularly where lots or development has been sold off the plan, and design changes are necessary to accommodate stormwater quality treatment and hydrological controls; - Development contributions applicable to greenfield development. considers the above costs are substantial, and may render projects infeasible. Outlines that the immediate imposition of new rules and associated costs, have not been priced in and will provide uncertainty on the viability of many projects. Considers projects that already have resource consent from a local authority will be the greatest impacted.	

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Requests that whilst under section 86A of the RMA, the rules have immediate legal effect, the rule be written to have a later effectual legal effect. Considers the suggested amendments to Rule WH-R5 would allow sufficient time for pre-committed projects without resource consent to proceed with confidence, and allow pre-consented projects to proceed without design changes or additional consenting costs until their lapse period (typically 5 years). Considers if the new rules are applied to new projects from November 2024 onwards, they can be accounted for in the investment decision, thereby achieving the purpose of the NPS-FM without putting projects at risk of not proceeding. Requests the addition of a sunset clause stating 'given effect to within 2 years' aligning with the lapse period under the COVID-19 Recovery (Fast-track Consenting) Act 2020 so the effectual amnesty would apply to projects that are intended to develop within a reasonable timeframe, rather than applying to projects that want to hold or land bank development. Considers the added sunset clause will provide confidence in the delivery of pre-committed projects which will aid in providing additional housing under the NPS-UD. Seeks to include other means of hydrological control in the rule, refer to hydrological control definition above. Requests that whilst under section 86A of the RMA, the rules have immediate legal effect, the rule be written to have a later effectual legal effect.	

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers the suggested amendments to Rule WH-R5 would allow sufficient time for pre-committed projects without resource consent to proceed with confidence, and allow pre-consented projects to proceed without design changes or additional consenting costs until their lapse period (typically 5 years). Considers that if new rules apply new projects from November 2024 onwards, they can be accounted for in the investment decision, thereby achieving the purpose of the NPS-FM without putting projects at risk of not proceeding. Requests the addition of a sunset clause of 'given effect to' within 2 years, aligning with the lapse period under the COVID-19 Recovery (Fast-track Consenting) Act 2020 so the effectual amnesty would apply to projects that are intended to develop within a reasonable timeframe, rather than applying to projects that want to hold or land bank development. Considers the added sunset clause will provide confidence in the delivery of pre-committed projects which will aid in providing additional housing under the NPS-UD. Seeks to include other means of hydrological control in the rule, refer to hydrological control definition above.	
S252.027	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces -	Amend	Considers the timing should align with the feedback provided for Rule WH.R6	Amend wording to reference 2024, not 2023 (a)the proposal involves the creation of new impervious surfaces of between 1,000m2 and 3,000m2 (baseline property existing impervious area as at 30 October 20~~3~~**4**) Amend Rule WH.R6 to as follows

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		controlled activity.			... (d) where stormwater directly or indirectly (through an existing local authority stormwater network) discharges to a river, hydrological control is provided either: i) on-site, or ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has been sized to accommodate the proposed stormwater discharges; or**iii) Where a suitably qualified person has confirmed that soil infiltration rates are less than 2mm/hr or there is no area on the site of sufficient size to accommodate all required infiltration that is free of geotechnical limitations (including slope, setback from infrastructure, building structures or boundaries and water table depth), and rainwater reuse is not available because:** **i. the quality of the stormwater runoff is not suitable for on-site reuse (i.e. for non-potable water supply, garden/crop irrigation or toilet flushing); or** **ii. there are no activities occurring on the site that can re-use the full 5mm retention volume of water.** **The retention volume can be taken up by providing detention (temporary storage) for the difference between the pre-development and post development runoff volumes from the 95th percentile, 24 hour rainfall event minus any retention volume that is achieved, over the impervious area for which hydrology mitigation is required.**
S252.028	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing	Amend	Considers the timing should align with the feedback provided for Rule WH.R5	Submitter refers to their proposed amendment to Policy WH.R7.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		urbanised areas-controlled activity.			
S252.029	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Oppose	Submitter refers to feedback provided on Rule WH.P12 (note no feedback was provided on rule WH.P12 within the submission)	Submitter refers to proposed amendment to Policy WH.P12 (note no amendment was provided for Policy WH.P12 within the submission)
S252.030	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Amend	Submitter refers to feedback provided on Rule WH.P23 (note no feedback was provided on rule WH.P23 within the submission).	Submitter refers to proposed amendment to Policy WH.R23 (note no amendment was provided for Policy WH.P23 within the submission)
S252.031	12 Schedules	Schedule 30: Financial Contributions.	Amend	Considers payment of financial contributions for greenfield development should be based on the point source of contaminants, being the impervious area, rather than on a per lot (or EHU) basis. Suggests this should be on a m² basis as it applies to non-greenfield development.	Amend the Part D calculation of level of contribution of Schedule 30 to: D Calculation of level of contribution Financial contributions shall be calculated ~~per EHU for residential greenfield development (Table D1), or~~ per 100m2 for ~~non-residential greenfield~~ development and new roads/state highways. And consequential amendments to other references or policies as needed to align with the above amendment.
S252.032	12 Schedules	Schedule 30: Financial	Amend	Considers the payment of financial contributions should be levied by a local authority at the same time as the payment of other development contributions, for ease of administration,	Amend the Part D calculation of level of contribution of Schedule 30 to: Financial contributions shall be imposed as a condition of

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Contributions.		enforcement, and better alignment with when the effect is likely to be present. Suggests the payment of financial contribution be undertaken in a similar manner to rates payments where rates are paid and administered by a local authority, but allocated between regional and local councils. Concerned the current timing of the payment (when consent is given effect to) will add to upfront development costs, particularly for large staged development, putting many projects at risk as many developers rely on pre-sales to obtain funding for works. Considers provisions should be made for circumstances where residual contaminants are being treated on-site i.e. where using a treatment device further reduces contaminants beyond the assumed residual contaminants or where it treats contaminants off-site, such that the net contamination load is reduced following the development i.e. if the development treats flow from upstream. I notice that this submission point has been categorised to Schedule 30 whereas the same point for the Cuttriss submission (S219) has been further categorised to 'Part A'. Note my comments in that submission on this issue - I think the way they have done it here is probably correct.	consent and will be collected **by the local authority at the same time as payment of any other financial or development contributions are paid** ~~prior to the consent being given effect to.~~ And consequential amendments to other references or policies as needed to align with the above amendment. **Note a reduced contribution will be applied if the post-development residual contaminant load is less than 15%, or where treatment contributes towards a reduction in off-site contaminants.**
S252.033	12 Schedules	Schedule 30: Financial Contributions.	Amend	Notes that Schedule 28 states the target load reduction factor for bioretention is 90%, however the financial contribution is calculated based on treating 15% of remaining contaminant loading. Concerned there has not been an Economic Impact Assessment completed to inform these numbers	Amend the Part D financial contribution as follows: Whaitua Te Whanganui-a-Tara ~~$4,240~~ **2,827** Te Awarua-o-Porirua Whaitua ~~$4,599~~ **3,066** (Noting the submission point above, whereby we seek to remove charges based on EHU and therefore this table should be deleted in entirety)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				and if PC1 is requiring treatment to 90%, then any financial contribution should be reduced proportionately i.e. 1/3.	Whaitua Te Whanganui-a-Tara ~~$858~~ **572** ~~$360~~ **240** Te Awarua-o-Porirua Whaitua ~~$858~~ **572** ~~$360~~ **240** Furthermore, these numbers should be assessed following a peer reviewed Economic Impact Assessment.

S265 The Maymorn Collective - Amanda and Rami Mounla - Marita Manns Trustee Limited

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S265.001	General comments	General comments - consultation	Oppose	Considers GWRC have not adequately consulted with affected landowners or considered proposed UHCC Plan Change 50, and PC1 is inconsistent with PC50r.	Withdraw PC1 and conduct appropriate consultation and engagement.
S265.002	General comments	General comments - unplanned greenfield development	Oppose	Opposed the prohibition of unplanned green field development. Submitter outlines the emergence of decentralisation wastewater infrastructure is likely to accelerate, reducing the potential environmental impact from new developments. Considers GWRC should be considering each development individually, based on the merits and the impacts it has on the environment and any mitigation propose.	Review and amend PC1 to reflect the outcome of Plan Change 50'. Amend so areas covered by PC50r are not deemed to be a 'unplanned greenfield development'.
S265.003	General comments	General comments - economic cost/impact	Oppose	Considers the environmental and social benefits have not been quantified through a specialist economic impact assessment.	Withdraw PC1 and undertake a detailed economic, social and cultural impact assessment, that is publicly disclosed, and this is used to inform the revised plan change.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S265.004	General comments	General comments - overall	Oppose	Considers PC1 contains errors in drafting and fails to define what some key terms mean. Considers approach prevented stakeholders from understanding what is proposed and being able to be consulted and making well informed submissions.	Redraft PC1 correctly and renotify for consultation.
S265.005	General comments	General comments - current legislation	Oppose	Notes new Government's 2023 election platform sought to 'unlock land for housing' stating Councils in major towns and cities will be required to zone land for '30 years' worth of housing demand immediately'.	Revise any decision that prohibits the ability to unlock land for housing as proposed by PC1, to take into account, the directive of central Government policy initiatives, such as changes to the Resource Management Act.

S268 The Maymorn Collective - Bruce Bates and Kim Cheeseman

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S268.001	General comments	General comments - consultation	Oppose	Considers GWRC have not adequately consulted with affected landowners or considered proposed UHCC Plan Change 50, and PC1 is inconsistent with PC50r.	Withdraw PC1 and conduct appropriate consultation and engagement.
S268.002	General comments	General comments - unplanned greenfield development	Oppose	Opposed the prohibition of unplanned green field development. Submitter outlines the emergence of decentralisation wastewater infrastructure is likely to accelerate, reducing the potential environmental impact from new developments. Considers GWRC should be considering each development individually, based on the merits and the impacts it has on the environment and any mitigation propose.	Review and amend PC1 to reflect the outcome of Plan Change 50'. Amend so areas covered by PC50r are not deemed to be a 'unplanned greenfield development'.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S268.003	General comments	General comments - economic cost/impact	Oppose	Considers the environmental and social benefits have not been quantified through a specialist economic impact assessment.	Withdraw PC1 and undertake a detailed economic, social and cultural impact assessment, that is publicly disclosed, and this is used to inform the revised plan change.
S268.004	General comments	General comments - overall	Oppose	Considers PC1 contains errors in drafting and fails to define what some key terms mean. Considers approach prevented stakeholders from understanding what is proposed and being able to be consulted and making well informed submissions.	Redraft PC1 correctly and renotify for consultation.
S268.005	General comments	General comments - current legislation	Oppose	Notes new Government's 2023 election platform sought to 'unlock land for housing' stating Councils in major towns and cities will be required to zone land for '30 years' worth of housing demand immediately'.	Revise any decision that prohibits the ability to unlock land for housing as proposed by PC1, to take into account, the directive of central Government policy initiatives, such as changes to the Resource Management Act.

S270 The Maymorn Collective - Dean and Michelle Spicer and Benjamin Shaw (as Trustees for Bridgewater Trust)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S270.001	General comments	General comments - consultation	Oppose	Considers GWRC have not adequately consulted with affected landowners or considered proposed UHCC Plan Change 50, and PC1 is inconsistent with PC50r.	Withdraw PC1 and conduct appropriate consultation and engagement.
S270.002	General comments	General comments - unplanned greenfield development	Oppose	Opposed the prohibition of unplanned green field development. Submitter outlines the emergence of decentralisation wastewater infrastructure is likely to accelerate, reducing the potential environmental impact from new developments. Considers GWRC should be considering each	Review and amend PC1 to reflect the outcome of Plan Change 50'. Amend so areas covered by PC50r are not deemed to be a 'unplanned greenfield development'.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				development individually, based on the merits and the impacts it has on the environment and any mitigation propose.	
S270.003	General comments	General comments - economic cost/impact	Oppose	Considers the environmental and social benefits have not been quantified through a specialist economic impact assessment.	Withdraw PC1 and undertake a detailed economic, social and cultural impact assessment, that is publicly disclosed, and this is used to inform the revised plan change.
S270.004	General comments	General comments - overall	Oppose	Considers PC1 contains errors in drafting and fails to define what some key terms mean. Considers approach prevented stakeholders from understanding what is proposed and being able to be consulted and making well informed submissions.	Redraft PC1 correctly and renotify for consultation.
S270.005	General comments	General comments - current legislation	Oppose	Notes new Government's 2023 election platform sought to 'unlock land for housing' stating Councils in major towns and cities will be required to zone land for '30 years' worth of housing demand immediately'.	Revise any decision that prohibits the ability to unlock land for housing as proposed by PC1, to take into account, the directive of central Government policy initiatives, such as changes to the Resource Management Act.

S271 The Maymorn Collective - John and Susan Boyle

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S271.001	General comments	General comments - consultation	Oppose	Considers GWRC have not adequately consulted with affected landowners or considered proposed UHCC Plan Change 50, and PC1 is inconsistent with PC50r.	Withdraw PC1 and conduct appropriate consultation and engagement.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S271.002	General comments	General comments - unplanned greenfield development	Oppose	Opposed the prohibition of unplanned green field development. Submitter outlines the emergence of decentralisation wastewater infrastructure is likely to accelerate, reducing the potential environmental impact from new developments. Considers GWRC should be considering each development individually, based on the merits and the impacts it has on the environment and any mitigation propose.	Review and amend PC1 to reflect the outcome of Plan Change 50'. Amend so areas covered by PC50r are not deemed to be a 'unplanned greenfield development'.
S271.003	General comments	General comments - economic cost/impact	Oppose	Considers the environmental and social benefits have not been quantified through a specialist economic impact assessment.	Withdraw PC1 and undertake a detailed economic, social and cultural impact assessment, that is publicly disclosed, and this is used to inform the revised plan change.
S271.004	General comments	General comments - overall	Oppose	Considers PC1 contains errors in drafting and fails to define what some key terms mean. Considers approach prevented stakeholders from understanding what is proposed and being able to be consulted and making well informed submissions.	Redraft PC1 correctly and renotify for consultation.
S271.005	General comments	General comments - current legislation	Oppose	Notes new Government's 2023 election platform sought to 'unlock land for housing' stating Councils in major towns and cities will be required to zone land for '30 years' worth of housing demand immediately'.	Revise any decision that prohibits the ability to unlock land for housing as proposed by PC1, to take into account, the directive of central Government policy initiatives, such as changes to the Resource Management Act.

S267 The Maymorn Collective - Marlnuk Agistments Ltd - Richard and Lynn Bialy

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S267.001	General comments	General comments - consultation	Oppose	Considers GWRC have not adequately consulted with affected landowners or considered proposed UHCC Plan Change 50, and PC1 is inconsistent with PC50r.	Withdraw PC1 and conduct appropriate consultation and engagement.
S267.002	General comments	General comments - unplanned greenfield development	Oppose	Opposed the prohibition of unplanned green field development. Submitter outlines the emergence of decentralisation wastewater infrastructure is likely to accelerate, reducing the potential environmental impact from new developments. Considers GWRC should be considering each development individually, based on the merits and the impacts it has on the environment and any mitigation propose.	Review and amend PC1 to reflect the outcome of Plan Change 50'. Amend so areas covered by PC50r are not deemed to be a 'unplanned greenfield development'.
S267.003	General comments	General comments - economic cost/impact	Oppose	Considers the environmental and social benefits have not been quantified through a specialist economic impact assessment.	Withdraw PC1 and undertake a detailed economic, social and cultural impact assessment, that is publicly disclosed, and this is used to inform the revised plan change.
S267.004	General comments	General comments - overall	Oppose	Considers PC1 contains errors in drafting and fails to define what some key terms mean. Considers approach prevented stakeholders from understanding what is proposed and being able to be consulted and making well informed submissions.	Redraft PC1 correctly and renotify for consultation.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S267.005	General comments	General comments - current legislation	Oppose	Notes new Government's 2023 election platform sought to 'unlock land for housing' stating Councils in major towns and cities will be required to zone land for '30 years' worth of housing demand immediately'.	Revise any decision that prohibits the ability to unlock land for housing as proposed by PC1, to take into account, the directive of central Government policy initiatives, such as changes to the Resource Management Act.

S269 The Maymorn Collective - Paul and Megan Persico

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S269.001	General comments	General comments - consultation	Oppose	Considers GWRC have not adequately consulted with affected landowners or considered proposed UHCC Plan Change 50, and PC1 is inconsistent with PC50r.	Withdraw PC1 and conduct appropriate consultation and engagement.
S269.002	General comments	General comments - unplanned greenfield development	Oppose	Opposed the prohibition of unplanned green field development. Submitter outlines the emergence of decentralisation wastewater infrastructure is likely to accelerate, reducing the potential environmental impact from new developments. Considers GWRC should be considering each development individually, based on the merits and the impacts it has on the environment and any mitigation propose.	Review and amend PC1 to reflect the outcome of Plan Change 50'. Amend so areas covered by PC50r are not deemed to be a 'unplanned greenfield development'.
S269.003	General comments	General comments - economic cost/impact	Oppose	Considers the environmental and social benefits have not been quantified through a specialist economic impact assessment.	Withdraw PC1 and undertake a detailed economic, social and cultural impact assessment, that is publicly disclosed, and this is used to inform the revised plan change.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S269.004	General comments	General comments - overall	Oppose	Considers PC1 contains errors in drafting and fails to define what some key terms mean. Considers approach prevented stakeholders from understanding what is proposed and being able to be consulted and making well informed submissions.	Redraft PC1 correctly and renotify for consultation.
S269.005	General comments	General comments - current legislation	Oppose	Notes new Government's 2023 election platform sought to 'unlock land for housing' stating Councils in major towns and cities will be required to zone land for '30 years' worth of housing demand immediately'.	Revise any decision that prohibits the ability to unlock land for housing as proposed by PC1, to take into account, the directive of central Government policy initiatives, such as changes to the Resource Management Act.

S272 The Maymorn Collective - Philip and Teresa Eales

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S272.001	General comments	General comments - consultation	Oppose	Considers GWRC have not adequately consulted with affected landowners or considered proposed UHCC Plan Change 50, and PC1 is inconsistent with PC50r.	Withdraw PC1 and conduct appropriate consultation and engagement.
S272.002	General comments	General comments - unplanned greenfield development	Oppose	Opposed the prohibition of unplanned green field development. Submitter outlines the emergence of decentralisation wastewater infrastructure is likely to accelerate, reducing the potential environmental impact from new developments. Considers GWRC should be considering each development individually, based on the merits and the impacts it has on the environment and any mitigation propose.	Review and amend PC1 to reflect the outcome of Plan Change 50'. Amend so areas covered by PC50r are not deemed to be a 'unplanned greenfield development'.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S272.003	General comments	General comments - economic cost/impact	Oppose	Considers the environmental and social benefits have not been quantified through a specialist economic impact assessment.	Withdraw PC1 and undertake a detailed economic, social and cultural impact assessment, that is publicly disclosed, and this is used to inform the revised plan change.
S272.004	General comments	General comments - overall	Oppose	Considers PC1 contains errors in drafting and fails to define what some key terms mean. Considers approach prevented stakeholders from understanding what is proposed and being able to be consulted and making well informed submissions.	Redraft PC1 correctly and renotify for consultation.
S272.005	General comments	General comments - current legislation	Oppose	Notes new Government's 2023 election platform sought to 'unlock land for housing' stating Councils in major towns and cities will be required to zone land for '30 years' worth of housing demand immediately'.	Revise any decision that prohibits the ability to unlock land for housing as proposed by PC1, to take into account, the directive of central Government policy initiatives, such as changes to the Resource Management Act.

S266 The Maymorn Collective - Tamara Hrstich

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S266.001	General comments	General comments - consultation	Oppose	Considers GWRC have not adequately consulted with affected landowners or considered proposed UHCC Plan Change 50, and PC1 is inconsistent with PC50r.	Withdraw PC1 and conduct appropriate consultation and engagement.
S266.002	General comments	General comments - unplanned greenfield development	Oppose	Opposed the prohibition of unplanned green field development. Submitter outlines the emergence of decentralisation wastewater infrastructure is likely to accelerate, reducing the potential environmental impact from new developments. Considers GWRC should be considering each	Review and amend PC1 to reflect the outcome of Plan Change 50'. Amend so areas covered by PC50r are not deemed to be a 'unplanned greenfield development'.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				development individually, based on the merits and the impacts it has on the environment and any mitigation propose.	
S266.003	General comments	General comments - economic cost/impact	Oppose	Considers the environmental and social benefits have not been quantified through a specialist economic impact assessment.	Withdraw PC1 and undertake a detailed economic, social and cultural impact assessment, that is publicly disclosed, and this is used to inform the revised plan change.
S266.004	General comments	General comments - overall	Oppose	Considers PC1 contains errors in drafting and fails to define what some key terms mean. Considers approach prevented stakeholders from understanding what is proposed and being able to be consulted and making well informed submissions.	Redraft PC1 correctly and renotify for consultation.
S266.005	General comments	General comments - current legislation	Oppose	Notes new Government's 2023 election platform sought to 'unlock land for housing' stating Councils in major towns and cities will be required to zone land for '30 years' worth of housing demand immediately'.	Revise any decision that prohibits the ability to unlock land for housing as proposed by PC1, to take into account, the directive of central Government policy initiatives, such as changes to the Resource Management Act.

S275 The New Zealand Transport Agency

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S275.001	General comments	General comments - overall	Oppose	Concerned at the scale of changes proposed in the Plan change and the timeframes for implementation. Considers the section 32 analysis has not considered the costs associated with introducing such wide-ranging changes with immediate legal effect, including the cost of projects which are in construction and/or budgeted for this earthworks	Remove the immediate legal effect of provisions via a variation. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				season but which have no allocated funding for additional consents and/or more restrictive working conditions	
S275.002	General comments	General comments - definitions	Amend	Seeks that 'new state highways' is defined. Provides a suggested definition but is open to alternative wording, considers it must make clear that the definition only relates to 'new' state highways and not alterations to existing ones.	Define new state highways as: a new road operated by NZ Transport Agency. This excludes any upgrades or alterations to an existing state highway. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.003	2 Interpretation	Earthworks	Amend	Considers the definition is very confined and will not allow for the construction, repair, upgrade or maintenance of infrastructure.	Provide an exclusion (as per (d) "for all other whaitua") to enable construction, repair, upgrade or maintenance of infrastructure where standards are met. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.004	2 Interpretation	Redevelopment	Amend	Supports excluding 'minor maintenance and repairs to roads...' and 'installation, maintenance or repair of underground infrastructure or network utilities requiring trenching and resurfacing'. Seeks that the scale of maintenance and repair works is not limited to "minor"	Delete "minor" where it appears before "maintenance and repairs to roads". Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.005	General comments	General comments - definitions	Amend	Notes the definition of 'property' would include the entire state highway as a single property and subsequently rule P.R22(c) would apply the earthworks limitations (3000m² over 12 months) to the entire state highway network. Notes other examples include WH.P14(a)(i) and P.R17.	Delete the reference to 'property' relative to all state highways. Replace it with reference to 'project' or similar. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.006	5.1 Air quality rules	Rule R34: Mobile source emissions - permitted activity.	Amend	Notes the s32 assessment indicates that this rule along with others are permitted activities within the coastal marine area but are inappropriate and there is no precedent or demand. Notes that marine transport operates within the coastal environment and is a 'mobile discharge' and there is a 'demand' for this as a permitted activity.	Reinstate the 'coastal icon' to Rule 5.1.10 Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.007	9 Te Awarua-o-Porirua Whaitua	8.2.1 Discharges to water	Amend	Considers it unclear if Policy P.P5 and Policy P.P6 are intended to apply to stormwater network discharge points noting that Policy WH.P6 specifically excludes stormwater networks.	Specifically exclude stormwater networks from consideration under WH.P5, P.P5 and P.P6 and related provisions (to be consistent with WH.P6).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers that stormwater networks are subject to a range of other controls which would address issues identified in P.P5 and P.P6 so should be specifically excluded from these provisions.	Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.008	8 Whaitua Te Whanganui-a-Tara	8.3.2 Stormwater	Amend	Considers the provisions would benefit from amendments to improve clarity of application and provide a revised policy and consenting structure. Suggests clarification as the term "new and redeveloped impervious surfaces" and "new greenfield development" are used frequently and both could be interpreted to include new or redeveloped state highways. Suggests explanatory notes could assist. Notes the rule frame also does not anticipate single point discharge locations which are otherwise 'disconnected from' the primary piped network. Suggests discharges to a (defined) stormwater network are not a direct discharge to land or water and do not require a consent and are to be managed by the network operator. Seeks reference to discharges to a stormwater network requiring consent be deleted.	Relief sought: Clarify that provisions relating to "new and redeveloped impervious surfaces" or "new greenfields developments" do not apply to state highways. Clarify the term "urban development" Confine provisions relating to point sources and cumulative effects of point sources to discharges which are not part of a stormwater network. Modify the rule structure for stormwater networks to reflect permitted and restricted discretionary activity status (with permitted activity standards and appropriate matters of discretion/assessment). Modify notification status to reflect statutory tests. Amend so stormwater networks (state highways) provide for: i. Permitted activity for existing (at notification date) state highway network subject to a Stormwater Management Strategy (regional or sub-regional) being provided within 5 years of date of plan operative date. ii. small areas of permitted increase in road impervious area (eg. to cater for safety or intersection improvements where specific treatment is provided (to be specified as a permitted activity standard). iii. provide for areas ancillary to 'live traffic lanes" eg. police parking pads, storage areas, access roads to stormwater treatment devices as a permitted activity iv. apply consent requirements only to higher volume roads. v. larger improvements or new roads as restricted discretionary activities. vi. No discretionary or non-complying activities. vii. notification subject to statutory notification tests (eg WH.R9 and P.RA). Schedule 31 Strategic Actions (b) sets out mana whenua and community engagement requirements and the S32A indicates this should preclude the need for notification.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.009	9 Te Awarua-o-Porirua Whaitua	9.2.2 Stormwater	Amend	Considers the provisions would benefit from amendments to improve clarity of application and provide a revised policy and consenting structure. Suggests clarification as the term "new and redeveloped impervious surfaces" and "new greenfield development" are used frequently and both could be interpreted to include new or redeveloped state highways. Suggests explanatory notes could assist. Notes the rule frame also does not anticipate single point discharge locations which are otherwise 'disconnected from' the primary piped network. Suggests discharges to a (defined) stormwater network are not a direct discharge to land or water and do not require a consent and are to be managed by the network operator. Seeks reference to discharges to a stormwater network requiring consent be deleted.	Relief sought: Clarify that provisions relating to "new and redeveloped impervious surfaces" or "new greenfields developments" do not apply to state highways. Clarify the term "urban development" Confine provisions relating to point sources and cumulative effects of point sources to discharges which are not part of a stormwater network. Modify the rule structure for stormwater networks to reflect permitted and restricted discretionary activity status (with permitted activity standards and appropriate matters of discretion/assessment). Modify notification status to reflect statutory tests Amend so stormwater networks (state highways) provide for: i. Permitted activity for existing (at notification date) state highway network subject to a Stormwater Management Strategy (regional or sub-regional) being provided within 5 years of date of plan operative date. ii. small areas of permitted increase in road impervious area (eg. to cater for safety or intersection improvements where specific treatment is provided (to be specified as a permitted activity standard). iii. provide for areas ancillary to 'live traffic lanes" eg. police parking pads, storage areas, access roads to stormwater treatment devices as a permitted activity iv. apply consent requirements only to higher volume roads. v. larger improvements or new roads as restricted discretionary activities. vi. No discretionary or non-complying activities. vii. notification subject to statutory notification tests (eg WH.R9 and P.RA). Schedule 31 Strategic Actions (b) sets out mana whenua and community engagement requirements and the S32A indicates this should preclude the need for notification. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S275.010	9 Te Awarua-o-Porirua Whaitua	Objective P.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Pāuatahanui Inlet, Onepoto Arm and the open coastal areas of Te Awarua-o-Porirua is maintained or improved to achieve the coastal water objectives set out in Table 9.1.	Amend	While NZTA supports the intent behind the reduction in contaminant loads proposed, it is unclear if and how the reduction can be sustained and further information should be provided before such targets are adopted. The Section 32 assessment states "...the economic costs to communities are likely to be significant due to infrastructure upgrade costs [when compared to 'status quo'] (page 162). It is also noted that cost assessments (page 151 and 152) focus on local authority costs, not NZTA costs which seem to have been omitted. The value of investment/forward planning which has already been made through the consent process under the Operative Plan is also not explicitly recognised in the section 32.	Further consideration of the feasibility and costs of these targets. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.011	9 Te Awarua-o-Porirua Whaitua	Policy P.P1: Improvement of aquatic ecosystem health.	Amend	While NZTA supports the intent behind the reduction in contaminant loads proposed, it is unclear if and how the reduction can be sustained and further information should be provided before such targets are adopted. The Section 32 assessment states "...the economic costs to communities are likely to be significant due to infrastructure upgrade costs [when compared to 'status quo'] (page 162). It is also noted that cost assessments (page 151 and 152) focus on local	Further consideration of the feasibility and costs of these targets. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				authority costs, not NZTA costs which seem to have been omitted. The value of investment/forward planning which has already been made through the consent process under the Operative Plan is also not explicitly recognised in the section 32.	
S275.012	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	While NZTA supports the intent behind the reduction in contaminant loads proposed, it is unclear if and how the reduction can be sustained and further information should be provided before such targets are adopted. The Section 32 assessment states "...the economic costs to communities are likely to be significant due to infrastructure upgrade costs [when compared to 'status quo'] (page 162). It is also noted that cost assessments (page 151 and 152) focus on local authority costs, not NZTA costs which seem to have been omitted. The value of investment/forward planning which has already been made through the consent process under the Operative Plan is also not explicitly recognised in the section 32.	Further consideration of the feasibility and costs of these targets. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.013	9 Te Awarua-o-Porirua Whaitua	Policy P.P4: Contaminant load reductions.	Amend	While NZTA supports the intent behind the reduction in contaminant loads proposed, it is unclear if and how the reduction can be sustained and further information should be provided before such targets are adopted. The Section 32 assessment states "...the economic costs to communities are likely to be significant due to infrastructure upgrade costs [when compared to 'status quo'] (page 162). It is also noted that cost assessments (page 151 and 152) focus on local authority costs, not NZTA costs which seem to have been omitted. The value of investment/forward planning which has already been made through the consent process under the Operative Plan is also not explicitly recognised in the section 32.	Further consideration of the feasibility and costs of these targets. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S275.014	9 Te Awarua-o-Porirua Whaitua	Policy P.P12: Managing stormwater network discharges through a Stormwater Management Strategy.	Amend	While NZTA supports the intent behind the reduction in contaminant loads proposed, it is unclear if and how the reduction can be sustained and further information should be provided before such targets are adopted. The Section 32 assessment states "...the economic costs to communities are likely to be significant due to infrastructure upgrade costs [when compared to 'status quo'] (page 162). It is also noted that cost assessments (page 151 and 152) focus on local authority costs, not NZTA costs which seem to have been omitted. The value of investment/forward planning which has already been made through the consent process under the Operative Plan is also not explicitly recognised in the section 32.	Further consideration of the feasibility and costs of these targets. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.015	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges .	Amend	Considers it is outside of the direct control of NZTA to deliver source control for its stormwater network. Notes Schedule 27 requirements requires Work with the Ministers for the Environment and Transport, Waka Kotahi NZ Transport Agency and the territorial authorities to promote source control for copper from vehicles . Considers more flexibility is required in whether the stormwater network operator does not have full mandate over the contaminant source.	Modify WH.P10(a) to provide for flexibility where the stormwater network operator does not have full mandate over the contaminant source. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.016	9 Te Awarua-o-Porirua Whaitua	Policy P.P10: Managing adverse effects of stormwater discharges .	Amend	Considers it is outside of the direct control of NZTA to deliver source control for its stormwater network. Notes Schedule 27 requirements requires Work with the Ministers for the Environment and Transport, Waka Kotahi NZ Transport Agency and the territorial authorities to promote source control for copper from vehicles . Considers more flexibility is required in WH.P10(a) whether the stormwater network operator does not have full mandate over the contaminant source.	Modify P.P10(a) to provide for flexibility where the stormwater network operator does not have full mandate over the contaminant source. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.017	9 Te Awarua-	Policy P.P12:	Amend	Notes policy P.P12(a) specifies numeric limits but has no time frame and applies equally to local	Delete P.P12(a). Modify P.P12 (e) and (f) to reflect varying consent

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	Managing stormwater network discharges through a Stormwater Management Strategy.		authority and state highway networks. Considers policies WH.P13 (d) and P.P12(e) should be modified to reflect the scale of consent proposed. Considers policies WH.P13 (e) and P.P12(f) should be addressed as consent condition where appropriate, with regional modelling and monitoring.	application scale and to address monitoring on a consent by consent basis respectively. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.018	8 Whaitua Te Whanganui-a-Tara	Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy.	Amend	Notes policy P.P12(a) specifies numeric limits but has no time frame and applies equally to local authority and state highway networks. Considers policies WH.P13 (d) and P.P12(e) should be modified to reflect the scale of consent proposed. Considers policies WH.P13 (e) and P.P12(f) should be addressed as consent condition where appropriate, with regional modelling and monitoring.	Modify WH.P13 (d) and (e) to reflect varying consent application scale and to address monitoring on a consent by consent basis respectively. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.019	8 Whaitua Te Whanganui-a-Tara	Rule WH.R1: Point source discharges of specific contaminants - prohibited activity.	Oppose	Considers this rule cannot be complied with as items such as paint and cement are required for the construction and maintenance of structures in the coastal marine area. Considers the prohibited activity status is inflexible and could have unintended consequences as other potentially more harmful substances may have to be used instead.	Delete this rule Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.020	9 Te Awarua-o-Porirua Whaitua	Rule P.R1: Point source discharges of specific contamina	Oppose	Considers this rule cannot be complied with as items such as paint and cement are required for the construction and maintenance of structures in the coastal marine area. Considers the prohibited activity status is inflexible and could have unintended consequences as other	Delete this rule Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		nts - prohibited activity.		potentially more harmful substances may have to be used instead.	
S275.021	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Neutral	Considers the rule does not take into account the state highway network given that the highway network and worksites use the local authority network. Considers the rule needs to provide for the discharge where the water does not contain contaminants.	Delete this rule and provide for areas of the transport network which do not accommodate vehicle traffic as a permitted activity Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.022	9 Te Awarua-o-Porirua Whaitua	Rule P.R2: Stormwater to land - permitted activity.	Amend	Considers the rule does not take into account the state highway network given that the highway network and worksites use the local authority network. Considers the rule needs to provide for the discharge where the water does not contain contaminants.	Delete this rule and provide for areas of the transport network which do not accommodate vehicle traffic as a permitted activity Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.023	9 Te Awarua-o-Porirua Whaitua	Rule P.R8: Stormwater from a local authority or state highway network-restricted discretionary activity.	Amend	Considers it unclear if this rule applies to existing (consented) or unconsented networks and if it applies to existing consented networks, whether a further consent is now also required.	Clarify the intent of the rule and amend if required to only apply to unconsented works Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.024	8 Whaitua Te Whanganui-a-Tara	Rule P.R9: Stormwater from new state highways-discretionary activity.	Amend	Considers it unclear if this rule applies to existing (consented) or unconsented networks and if it applies to existing consented networks, whether a further consent is now also required.	Clarify the intent of the rule and amend if required to only apply to unconsented works Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.025	9 Te Awarua-o-Porirua Whaitua	Rule P.R9: Stormwater from new state highways-	Amend	Considers the activity status does not reflect the known effects and specificity of specific management methods contained within the plan change. Considers a restricted discretionary activity status is appropriate.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discretionary activity.			
S275.026	8 Whaitua Te Whanganui-a-Tara	Rule WH.R10: Stormwater from new state highways- discretionary activity.	Amend	Considers the activity status does not reflect the known effects and specificity of specific management methods contained within the plan change.	Change WH.R10: Stormwater from new state highways - to restricted discretionary activity Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.027	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity.	Amend	Notes that NZTA need to remove vegetation to provide for a safe transport network and the requirement to obtain a consent for any removal on high erosion risk land is overly onerous and would give rise to unacceptable safety effects. Suggests a permitted activity status for limited removals subject to appropriate performance standards would achieve safe outcomes as was provided for under the operative provisions. Considers a restricted discretionary activity should be provided.	Provide for vegetation removal as a permitted activity when associated with the maintenance of a transport network. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.028	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land - controlled activity.	Amend	Notes that NZTA need to remove vegetation to provide for a safe transport network and the requirement to obtain a consent for any removal on high erosion risk land is overly onerous and would give rise to unacceptable safety effects. Suggests a permitted activity status for limited removals subject to appropriate performance standards would achieve safe outcomes as was provided for under the operative provisions.	Provide for vegetation removal as a permitted activity when associated with the maintenance of a transport network. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.029	9 Te Awarua-o-Porirua Whaitua	Rule P.R16: Vegetation clearance on highest erosion risk land-	Amend	Notes that NZTA need to remove vegetation to provide for a safe transport network and the requirement to obtain a consent for any removal on high erosion risk land is overly onerous and would give rise to unacceptable safety effects. Suggests a permitted activity status for limited removals subject to appropriate performance	Provide for vegetation removal as a permitted activity when associated with the maintenance of a transport network. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.		standards would achieve safe outcomes as was provided for under the operative provisions.	
S275.030	9 Te Awarua-o-Porirua Whaitua	Rule P.R17: Vegetation clearance on highest erosion risk land - controlled activity.	Amend	Notes that NZTA need to remove vegetation to provide for a safe transport network and the requirement to obtain a consent for any removal on high erosion risk land is overly onerous and would give rise to unacceptable safety effects. Suggests a permitted activity status for limited removals subject to appropriate performance standards would achieve safe outcomes as was provided for under the operative provisions.	Provide for vegetation removal as a permitted activity when associated with the maintenance of a transport network. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.031	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	Notes the notified version of this rule contained errors which have now been corrected. Considers the rule also needs to be amended to provide for the ability of some sediment and/or flocculant the stormwater network. Considers a limit of no discharge is unworkable without completely isolating the site from the network and treating all sediment / flocculant discharge to 100% is not feasible.	Amend the rules to provide for some sediment and/or flocculant discharge where appropriate sediment control methods are in place. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.032	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	Notes the notified version of this rule contained errors which have now been corrected. Considers the rule also needs to be amended to provide for the ability of some sediment and/or flocculant the stormwater network. Considers a limit of no discharge is unworkable without completely isolating the site from the network and treating all sediment / flocculant discharge to 100% is not feasible.	Amend the rule to provide for some sediment and/or flocculant discharge where appropriate sediment control methods are in place. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.033	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Amend	Notes the notified version of this rule contained errors which have now been corrected. Considers the rule also needs to be amended to provide for the ability of some sediment and/or flocculant the stormwater network. Considers a limit of no discharge is unworkable without completely isolating the site from the network and treating all sediment / flocculant discharge to 100% is not feasible.	Amend the rule to provide for some sediment and/or flocculant discharge where appropriate sediment control methods are in place. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S275.034	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Amend	Notes the notified version of this rule contained errors which have now been corrected. Considers the rule also needs to be amended to provide for the ability of some sediment and/or flocculant the stormwater network. Considers a limit of no discharge is unworkable without completely isolating the site from the network and treating all sediment / flocculant discharge to 100% is not feasible.	Amend the rule to provide for some sediment and/or flocculant discharge where appropriate sediment control methods are in place. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.035	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Amend	Notes the notified version of this rule contained errors which have now been corrected. Considers the rule also needs to be amended to provide for the ability of some sediment and/or flocculant the stormwater network. Considers a limit of no discharge is unworkable without completely isolating the site from the network and treating all sediment / flocculant discharge to 100% is not feasible.	Amend the rule to provide for some sediment and/or flocculant discharge where appropriate sediment control methods are in place. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.036	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose	Considers prohibiting earthworks between the 1st of June and the 30th of September would impose significant constraints on the construction programme for NZTA's essential works to provide for a safe transport network. Suggests instead of blanket rules and non-complying activity status for winter works, a permitted level to provide for maintenance and minor upgrade activity (subject to appropriate controls as a performance standard) combined with a restricted discretionary status for larger scale works can address any potential issues with winter works.	Remove the control on winter works or, at a minimum, provide for a process for 'winter works' approval without the need for a further resource consent. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.037	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose	Considers prohibiting earthworks between the 1st of June and the 30th of September would impose significant constraints on the construction programme for NZTA's essential works to provide for a safe transport network. Suggests instead of blanket rules and non-complying activity status for winter works, a	Remove the control on winter works or, at a minimum, provide for a process for 'winter works' approval without the need for a further resource consent. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				permitted level to provide for maintenance and minor upgrade activity (subject to appropriate controls as a performance standard) combined with a restricted discretionary status for larger scale works can address any potential issues with winter works.	
S275.038	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Amend	Notes these provisions contain specific numeric standards for discharge of sediment which does not allow for a site by site assessment to determine if the standard set is appropriate for the receiving environment. Concerned that determining activity status will be based on a predicted level of performance and it is unclear if a further consent (under Rule P.R24) would be required if P.R.23(a) was not met. Considers the 100g/m3 and associated 20% and 30% visual clarity requirements would be better placed as matters of discretion/assessment and set in a policy framework which indicates this is a desired outcome, to allow for different parameters to be set based on the detail of the receiving environment.	Modify rules to provide for 100g/m3 and associated 20% and 30% visual clarity as matters of discretion/assessment. Adjust policy framework to set 100g/m3 and associated 20% and 30% visual clarity as outcomes to be achieved unless an alternative, receiving environment specific, outcome is agreed. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.039	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Amend	Notes these provisions contain specific numeric standards for discharge of sediment which does not allow for a site by site assessment to determine if the standard set is appropriate for the receiving environment. Concerned that determining activity status will be based on a predicted level of performance and it is unclear if a further consent (under Rule P.R24) would be required if P.R.23(a) was not met. Considers the 100g/m3 and associated 20% and 30% visual clarity requirements would be better placed as matters of discretion/assessment and set in a policy framework which indicates this is a desired outcome, to allow for different parameters to be set based on the detail of the receiving environment.	Modify rules to provide for 100g/m3 and associated 20% and 30% visual clarity as matters of discretion/assessment. Adjust policy framework to set 100g/m3 and associated 20% and 30% visual clarity as outcomes to be achieved unless an alternative, receiving environment specific, outcome is agreed. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S275.040	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Amend	Supports the intent behind the reduction in contaminant loads proposed but is unclear if and how the reduction can be sustained. Suggests further information should be provided before targets are adopted. Considers the Section 32 assessment focuses on local authority costs, not NZTA costs and the value of investment/forward planning which has already been made through the consent process under the Operative Plan is also not explicitly recognised.	Further consideration of the feasibility and costs of this these targets Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.041	12 Schedules	Schedule 28: Stormwater Contaminant Treatment.	Amend	Notes that schedule 28 specifies that it applies only to WH.R6, WH.R7, P.R6 and P.R7 but schedule 29(6) requires an assessment under Schedule 28. Generally supports provision of guidance on treatment methods concerned with the content of Schedule 28. Notes it provides for only a limited range of treatment options but other proprietary devices are available which could be utilised and there is not detail as to the time over which the percentage treatment is to be achieved.	Broaden the methods and outcomes to provide flexibility. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought. Seeks additional clarification that compliance is to be achieved in the long term and that rainfall events that exceed the capacity of the treatment are simply discharged without causing nuisance or alternatively an adjustment to the percentage outcomes sought
S275.042	12 Schedules	Schedule 29: Stormwater Impact Assessments.	Amend	Suggests Schedule 29 should be prefaced with a statement which reflects Schedule 4 of the RMA "...must be specified in sufficient detail to satisfy the purpose for which it is required"	Add prefacing text which indicates that the Stormwater Impact Assessment should be of a scale which reflects the application to which it relates. For example: A stormwater impact assessment shall include the following analysis in sufficient detail to satisfy the purpose for which it is required: Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.043	12 Schedules	Schedule 30: Financial Contributions.	Oppose	Concerned about the philosophy and methodology for the proposed financial contributions for new state highways as set out below. Notes that NZTA invests significant sums in stormwater treatment and seeks to progressively improve treatment in highly constrained environments and is concerned that a contribution on top of these investments is unreasonable and	Remove the provisions for financial contributions for state highways. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				could make some projects unviable. Suggests the level of adverse effect from state highway discharges has not been quantified nor have a reasonable range of measures been investigated to determine the most appropriate action in a section 32 analysis. Notes the proposal if implemented would require significant amounts of public money to be expended and suggests the 32 analysis does not acknowledge these costs, nor does it clearly outline how the $360 per 100m2 figures have been derived. Considers in the absence of this information, it is not clear that the charges are fair, reasonable nor proportionate; Notes that funding for projects is allocated in advance and any current project applying for consent will not have budgeted for these contributions. If a financial contribution were to be proposed it would need to be implemented on phased basis and/or have an exemption for essential infrastructure such as state highways. Notes there is no differentiation for state highway areas which are not 'live traffic' lanes i.e.. not vehicle contaminant generating (eg. police parking areas, maintained areas/access, shoulders).	
S275.044	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Notes the prefacing text implies (but is not specific) that a single network stormwater management strategy (SMS) will be provided but notes this may not be the case and catchment or area based SMSs may be provided	Modify prefacing text: A stormwater management strategy (or **strategies**) for the local authority or state highway stormwater networks shall be prepared and implemented that Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S275.045	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Suggests schedule 31 should be modified to reflect Schedule 4 of the RMA "...must be specified in sufficient detail to satisfy the purpose for which it is required". Notes a range of times would not apply to the state highway network (eg. wastewater) so the use of "shall" is inappropriate	Modify text following point 11:~~As a minimum,~~ a stormwater management strategy shall **be provided the following in sufficient detail to satisfy the purpose for which it is required:** Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.046	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Point 1 Considers it is not appropriate to require the stormwater network to be "in accordance" with the objectives and policies as this requires a literal compliance with higher level wording. Notes the SMS is prepared under the Regional Plan and must therefore align with the objectives and policies.	Delete Point 1 Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.047	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te	Amend	Point 4 Considers this point foresees an unrealistic degree of monitoring for the state highway network which has numerous discharge points	Remove state highways from this point. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Awarua-o-Porirua.			
S275.048	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Point 8 Notes it may not always be possible to identify locations for stormwater retention and detention in the state highway network and the wording should provide for this.	Reword as follows: identifies locations and opportunities **(if any)** for the retention or detention of stormwater flows or volumes, and Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.
S275.049	12 Schedules	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Amend	Supports the general principle of a management plan but considers the range of detailed matter is overly prescriptive, especially where combined with rules (eg WH.R18) that are required to be prepared in accordance with Schedule 33 (ie. suggesting non-compliance with the detail of Schedule 33 may lead to a change in activity status). Suggests a range of matters appear to be overly onus or uncertain. Notes B Management Objectives (b) requires pre-development levels of discharge, regardless of current land use. Notes B Management Objectives (d) assumes land use will be revegetated but this may not be the case where new infrastructure or buildings are proposed. Notes Operating systems and practices (c) appears to be mor focused on forestry activities. Considers Maps (b) (viii) an inappropriately high level of detail for (eg) 300m² of vegetation clearance but is perhaps suitable for large scale clearance.	Move to a guideline and/or reassess the detail within Schedule 33 with inclusion of prefacing statements indicating that the Management Plan should reflect likely effects of the proposal. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.

S218 Tim Moody

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S218.001	General comments	General comments - overall	Not Stated	Endorses the submission of Robert James Anker	Endorses the relief sought in the submission of Robert James Anker
S218.002	6 Other methods	Method M42: Small farm property registration within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Oppose	Opposes the inclusion of farms between 4-20 due to the requirements placed on small lifestyle block owners and considers the proposed changes make the land incapable of reasonable use.	Exclude lifestyle blocks of circa 4 hectares, with the minimum inclusion size being 10 hectares. Ensure PC1 does not make land incapable of reasonable use.

S283 Todd Henry

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S283.001	General comments	General comments - overall	Not Stated	Submitter values the water quality values of the following areas for contact recreation and ecosystem health: i. Te Awakairangi / the Hutt River ii. he Whakatikei River iii. Te Whanganui a Tara / Wellington Harbour, Considers the natural form and character of these waterbodies is an important part of their value. Natural form and character creates rapids and other features of these sections of river that make them	Requests the outstanding value of this section [Te Awakairangi / the Hutt Gorge] of river recognised in the plan.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				valuable for kayaking. Te Awakairangi / the Hutt Gorge is an outstanding run for whitewater kayaking, which traverses what they consider an outstanding landscape with outstanding amenity values. Would like to see the outstanding value of this section of river recognised in the plan. The natural and wildlife values of these areas are also important to submitter.	
S283.002	General comments	General comments - freshwater	Not Stated	Concerned about increased amounts of sediment in the Hutt River when flows increase and potential e.coli and pathogen loads in the water. Observes algae in summer months when flows are low resulting in issues with recreation and amenity as well as human health when making contact with water. Concerns that river engineering such as railway iron degrades water quality and creates potential hazards for river users when slash and logs get caught on structures	Not Stated
S283.003	General comments	General comments - overall	Support	Supports PC1 and water quality improvement initiatives.	Requests that GWRC initiatives are carried through to the operative plan, particularly where they protect and restore ecosystem health, contact recreation values, natural form and character, and amenity.
S283.004	General comments	General comments - freshwater	Support	Considers these are a priority under Te Mana o te Wai	Prioritise ecosystem health and contact recreation prioritised. Prioritise ecosystem health and contact recreation prioritised.
S283.005	General comments	General comments - water quality improvements	Support	Key concerns are water quality (particularly e. coli, sediment, algal growth/periphyton, and ecosystem health); amenity; contact recreation; and natural form and character.	Seeks the following: Recognition in the plan of the outstanding kayaking / packrafting / rafting values in the Whaitua are recognised in the plan, particularly for the Hutt Gorge (which has outstanding kayaking, amenity, and landscape values).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					More work by GWRC to monitor and preserve natural character, and to strengthen objectives, policies, and rules which allow the river to function more naturally, particularly in its reaches influenced by flood protection. Targets for natural character that are similar to the sorts of targets set for water quality and seeks objectives and policies that support these. More work to enhance water quality in the coastal environment, for use of 'flat water' environments to learn and train without worrying about compromising health if contact is made with the water. Retain coastal water quality indicators/targets.
S283.006	General comments	General comments - target attribute states	Support	Supports targets in the water quality target tables.	Requests as much work as possible is done through environmental limits to achieve these targets.

S175 Tracy Simms

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S175.001	General comments	General comments - consultation	Oppose	Concerns the consultation process has not included all affected properties.	Withdraw the Plan Change
S175.002	General comments	General comments - overall	Oppose	Questions how provisions can be applied to properties both upstream and downstream where there are very few monitoring sites.	Withdraw the Plan Change
S175.003	General comments	General comments	Not Stated	Considers provisions on fencing waterways are contrary to previous advice provided by GWRC.	Withdraw the Plan Change

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		- water bodies			
S175.004	General comments	General comments - freshwater	Not Stated	Considers there is not enough water quality information to confirm where sediment is originating from and that more monitoring stations/points and more data are required to establish the source of any quality reduction.	Withdraw the Plan Change
S175.005	12 Schedules	Schedule 35: Small farm registration.	Oppose	Concerns about the range of data required and the expertise required to produce the amount of data required. Concerns that GWRC has not yet developed its own systems to receive this data.	Withdraw the Plan Change

S177 Transpower New Zealand Limited

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S177.001	General comments	General comments - current legislation	Not Stated	Notes PC1 should give effect to the NPS-FM whilst also giving effect to all other national policy statements including the NPSET and NESETA but the s32 report does not reference the NPSET and NESETA and appears that they have not been considered in the PC1 preparation. Seeks to ensure the objective of the NPSET is given effect to through provisions of PC1 while also giving effect to the NPS-FM.	Ensure the objective of the NPSET is given effect to through provisions of PC1 while also giving effect to the NPS-FM.
S177.002	General comments	General comments - overall	Not Stated	The submitter recognises the objectives and policies of he RRPS and NRP for regionally significant infrastructure will continue to apply under PC1. Considers it is not evident from the provisions of PC1, or s32 Report, that consideration has been given to providing for the RPS and NRP objectives and policies related to regionally significant infrastructure when developing provisions for the whaitua.	Ensure that higher-order direction on regionally significant infrastructure continues to be provided for through PC1 while also giving effect to the NPS-FM.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S177.003	General comments	General comments - unplanned greenfield development	Not Stated	Considers the definition of unplanned greenfield development is too broad and uncertain. Unclear if all development is prohibited or just specific kinds of urban development. Concerns the approach could prohibit works on regionally significant infrastructure (including the National Grid) in areas identified as "unplanned greenfield development areas". Concerned that the policies and rules of "unplanned greenfield development areas" may capture works on the national grid which would be contrary to Policy 14 and the objective of the NPSET. Questions the efficiency and practicability of the proposed approach which creates jurisdictional overlap between territorial authorities, the regional council, and the Minister of Conservation)on the management of development in "unplanned greenfield development areas". Concerns with Councils stance that an overlap will be addressed through "concurrent plan change processes" but any process would be ad-hoc and without any overarching legislation to give structure and certainty to submitters, applicants, and the local authorities. Concerned about the concurrent process anticipated to manage "unplanned greenfield development" areas, noting decisions on separate plan changes must be made separately. Notes Territorial authorities and the regional council have a duty to avoid unreasonable delay, which may result in concurrent plan changes becoming unsynchronised. Consider ad-hoc process is likely to be inefficient and frustrating, and risks inconsistent decision making. Considers the appropriate means of providing for a combined regulatory approach is through a combined planning document to address the issue, as per section 80 of the RMA.	Define the term "greenfield development", and that this term must exclude the operation, maintenance, upgrading, or development of regionally significant infrastructure'.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S177.004	General comments	General comments - definitions	Not Stated	Notes significant changes to Policy 7 of the RPS through Proposed Change 1 as recommended through the S42A officer right of reply.	Redevelopment of existing or the creation of new impervious surfaces at high-risk industrial or trade premises should be a permitted or controlled activity, subject to appropriate conditions.
S177.005	General comments	General comments - earthworks	Not Stated	Notes the NESETA does not regulate earthworks subject to a regional rule and therefore the earthworks rules apply to National Grid activities. Considers the earthworks policies and rules in PC1 do not provide for a reasonable level of earthworks with no permitted activity standards for earthworks at any scale. Submitter notes above notified rule framework is an error which has been corrected by GWRC under clause 16 Schedule 1 to RMA as a memo on December 6th 2023. Submitter notes their submission is made on PC1 as notified with legal effect of provisions. Considers it inefficient for almost all earthworks to require resource consent as this will create an administrative burden with little clear environmental benefits and adverse effects can be managed through permitted activity conditions. Opposes the blanket shutdown of earthworks between June-October as instances may occur where this is unavoidable and can be carefully managed mitigate adverse effects on stability and run-off. Notes the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021) provides a pathway for earthworks to be undertaken in winter months and is referred to in the earthwork provisions. Concerns the activity status pathway for earthworks insufficient to facilitate upgrading or development of the National Grid, consistent with NPSET. Concerns of uncertainty as to whether consents will be granted under s104D of the RMA, even when effects triggers can be sufficiently mitigated through consent conditions.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S177.006	General comments	General comments - definitions	Not Stated	Concerns the vegetation clearance provisions on 'high erosion risk land' do not recognise need to undertake vegetation clearance to prevent encroachment of woody vegetation on National Grid transmission lines and support structures. Submitter is not opposed to revegetation generally, but considers revegetation should not be promoted underneath or near to National Grid transmission lines and support structures, as this may compromise future safe operation of the National Grid. Questions appropriateness of mapping used to identify where resource consent is required for vegetation clearance. Notes mapping includes small and incohesive areas of vegetation, and questions efficiency or effectiveness of regulating these. Considers maps should be amended to only identify cohesive areas of vegetation being subject to rules. Seeks specific reference to NESETA at start of chapter to highlight NESETA regulations to plan users.	Amend maps to only identify cohesive areas of vegetation being subject to rules. Include specific reference to NESETA at start of chapter to highlight NESETA regulations to plan users.
S177.007	General comments	General comments - stormwater management	Not Stated	Concerns PC1 promotes mandatory financial contributions as a method of offsetting residual adverse effects of contaminants from impervious surface runoff that are considered to be impractical to treat on site, but treatment methods incorporated into the stormwater discharge rules. Considers approach taken by PC1 requiring financial contributions to offset all residual adverse effects regardless of scale is inconsistent with the NPS-FM, which only requires residual adverse effects that are more than minor be offset (or compensated). Considers applicants should be given reasonable opportunity to avoid, minimise or remedy adverse effects associated with contaminants in stormwater runoff and only circumstances where residual adverse effects are	Remove the mandatory requirement for financial contributions as a condition of rules, but the financial contributions regime proposed by PC1 continues to be provided for through PC1's policies, as an optional method alongside other offsetting or compensation methods provided for by the NPS-FM.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				more than minor should offsetting or compensated. Considers circumstances where offsetting or compensation is required, applicants should not be bound to financial contributions, and should have an option to propose offsetting or compensation in line with Appendix 6 and Appendix 7 of the NPS-FM. Considers financial contributions method could be an effective method of offsetting and should remain open as an option, but will only be effective if used to deliver appropriate offsetting projects. For consistency between financial contributions provisions proposed by PC1 and NPS-FM, submission seeks the mandatory requirement for financial contributions as a condition of the rules is removed, but the financial contributions regime proposed by PC1 continues to be provided for through PC1's policies, as an optional method alongside other offsetting or compensation methods provided for by the NPS-FM.	
S177.008	General comments	General comments - fresh water	Not Stated	Considers it inappropriate that provisions for vegetation clearance and the permitted activity rule for earthworks have been included in the freshwater planning instrument, as the principal purpose of these provisions is to control the use of land for the purpose of soil conservation. In addition to this, these rules do not manage discharges to freshwater. Considers provisions must be reallocated to Part 1 Schedule 1 planning instrument.	Reallocate vegetation clearance and the permitted activity rule for earthworks to Part 1 Schedule 1 planning instrument.
S177.009	2 Interpretation	Earthworks	Amend	Considers the rules for earthworks do not give effect to NPSET, as they do not provide for the reasonable maintenance, upgrading or development of the National Grid. Considers the operative definition exclusion for electricity lines and support structures (including the National Grid) should also apply to the proposed definition for a consistent approach. Considers the definition would be clearer by providing exclusions as a disjunctive list below	Amend provision as follows: For Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua only: The alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); ~~but excludes gardening,~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				the definition rather than embedded within definition as a conjunctive list.	~~cultivation, and disturbance of land for the installation of fence posts.~~ Except that, for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20, 'earthworks' has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017. **Earthworks do not include:** **(a) gardening** **(b) cultivation** **(c) disturbance of the land for the installation of fenceposts** **(d) the construction, repair, upgrade or maintenance of electricity lines and their support structures, including the National Grid** **(e) ...** For all other whaitua: [...]
S177.010	2 Interpretation	High risk industrial or trade premise	Amend	Considers term "contaminant" is too broad to be used in definition. Considers all industrial or trade premises could potentially fall under definition (not just those storing, generating or using hazardous substances). Considers the scope of activities covered by definition unclear. Notes focus of provisions the definition relates to is risk management of hazardous substances from high risk industrial or trade premises being entrained in stormwater, then definition should be amended to delete reference to "contaminants" and focus only on hazardous substances. Considers this would provide greater clarity to plan users on the scope of activities under the definition.	Amend as follows: High risk industrial or trade premise An industrial or trade premise that stores, uses or generates ~~contaminants or~~ hazardous substances on-site that are exposed to rain and could become entrained in stormwater. Activities that may occur at these premises could include:
S177.011	2 Interpretation	Highest erosion risk land (woody vegetation)	Neutral	Not stated	Retain as notified (noting the submission points on the maps and provision).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S177.012	2 Interpretation	Impervious surfaces	Neutral	Notes access to National Grid transmission lines and structures in rural areas is by vehicular access tracks which if considered to be impervious surfaces, could lead to a requirement for resource consent for routine reconditioning of existing access tracks and create an impediment to the operation and maintenance of the National Grid, contrary to policy 2 and policy 5 of NPSET. Considers for the avoidance of doubt, access tracks (including vehicular access tracks) should be excluded from definition of impervious surfaces.	Impervious surfaces Surfaces that prevent or significantly impede the infiltration of stormwater into soil or the ground, includes: roofs paved areas (including sealed/compacted metal) such as roads, driveways, parking areas, sidewalks/foot paths or patios, and excludes: grassed areas, gardens and other vegetated areas **access tracks (including vehicular access tracks)** porous or permeable paving slatted decks which allow water to drain through to a permeable surface porous or permeable paving and living roofs roof areas with rainwater collection and reuse any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)
S177.013	2 Interpretation	Redevelopment	Amend	Seeks reference to redevelopment of existing urbanised property is removed from chapeau, as the definition also applies to rules that are not exclusively limited to redevelopment of urbanised property (see for example rule WH.R11). Considers reference to "addition (new)" should be replaced with "addition of new" to improve clarity of provision. Seeks reference to "minor" be removed as it adds uncertainty to definition scope. Considers activity status for redevelopment of impervious surfaces associated with National Grid assets is overly onerous in context of policy 2 and policy 5 of NPSET. Considers that to give effect to policy 2 and policy 5 of the NPSET, as well as policies 13 and 14 in the NRP it is appropriate to exclude redevelopment of existing impervious surfaces for	Amend as follows: Redevelopment ~~For the purpose of assessment of a proposal involving the redevelopment of an existing urbanised property (i.e brownfield development, upgrades to existing roads etc.)~~ in relation to stormwater effects, this ~~includes~~ **is** the replacement, reconstruction, or addition ~~(new)~~ of ~~new~~ impervious surfaces. Excludes: • ~~minor~~ maintenance or repairs to roads, carparking areas, driveways and paving • installation, maintenance or repair of underground infrastructure or network utilities requiring trenching and resurfacing **redevelopment of existing impervious surfaces for the purposes of operating, maintaining, or upgrading the National Grid**

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				the purposes of operating, maintaining, or upgrading the National Grid from the definition.	activities that only involve the re-roofing of existing buildings.
S177.014	2 Interpretation	Unplanned greenfield development	Oppose	Notes "greenfield development" is undefined and there is a high degree of uncertainty about which developments are prohibited under the rules. Considers level of uncertainty inappropriate for a definition that determines the scope of prohibited activity rules. Notes if the term "greenfield development" is interpreted as development on greenfield land, it include all types of development, including the development of National Grid lines, structures, substations, and access. Notes prohibiting development of National Grid is contrary to objectives of the NPSET and could prohibit the development of other regionally significant infrastructure that provide social, economic, cultural, and environmental benefits to the region, and provide for the safe and efficient functioning of the region and beyond. Considers that the term "greenfield development" must be defined. and the term "urban development" should also be defined. Considers it necessary to exclude the maintenance, upgrading or development of regionally significant infrastructure from any definition of "greenfield development". Considers this package of amendments to definitions will provide sufficient certainty about scope of the term "greenfield development", provide for RPS integration, and ensure regionally significant infrastructure is not prohibited in "unplanned greenfield development" areas.	Amend the definition of "unplanned greenfield development" as follows: Unplanned greenfield development**Greenfield development** within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 which also require an underlying zone change (from rural/non- urban/open space to urban) though a District Plan change to enable the development. Note: Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023. Provide a definition of "greenfield development" as follows: **Greenfield development Urban development on land that has not been previously developed for urban land uses.** **Greenfield development excludes:** **operation, maintenance, upgrading or development of regionally significant infrastructure** As a consequential amendment, provide a definition of "urban development" to match the Regional Policy Statement definition as follows: **Urban development** **Urban development is subdivision, use and development that is characterised by its planned reliance on reticulated services (such as water supply and drainage) by its generation of traffic, and would include activities (such as manufacturing), which are usually provided for in urban areas. It also typically has lots sizes of less than 3000 square metres.**
S177.015	5.2 and 5.3 Discharge	Rule R101: Earthwork	Oppose	Seeks the operative permitted activity rule for earthworks continues to apply within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua	Retain rule R101 so that it continues to apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.

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	s to land and water and land use rules	s - permitted activity.		Whaitua, as rules WH.R23 and P.R22 do not provide any permitted activity threshold for earthworks smaller than 3,000m2 per property, and the operative rule provides reasonable conditions for undertaking all other earthworks that are less than 3,000m2 that are not otherwise permitted by WH.R23 and P.R22.	
S177.016	5.4 Beds of lakes and rivers	5.4.4 Uses of beds of lakes and rivers general conditions.	Amend	Seeks reference to NESETA to highlight to plan users and assist with plan interpretation. Considers it relevant given the potential difference in standards and activity status.	Insert the following to the Interpretation section of the chapter: **Many activities relating to the operation, maintenance, upgrading, relocation or removal of an electricity transmission line and ancillary structures that existed prior to 14 January 2010 are controlled by the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA), separate to this Plan. Where the provisions of this Plan conflict with the requirements of the NESETA, the provisions of the NESETA apply.**
S177.017	5.4 Beds of lakes and rivers	Rule R128: New structures - permitted activity.	Amend	Considers removal of reference to "structure" from chapeau significantly reduces range of structures permitted and it is unclear whether National Grid transmission lines traversing rivers or lakes will be permitted under rule. Considers reference to "cable" in rule is not sufficient to provide for National Grid, as National Grid cables are generally transmission lines located below ground (not those lines above ground). Seeks either the reference to "new structure" in chapeau is retained, or specific reference to National Grid transmission lines is provided for in rule, wherever the term "cable" is mentioned. Alternatively, considers matter would be addressed by reinstating words "structure, including" to chapeau of rule. Notes minor error in chapeau, where "structure associated with vegetative bank edge protection" should be amended to refer to structure in singular (rather than plural).	Reinstating the words "structure, including" to the chapeau of the rule. Alternatively, amend the rule as follows: Rule R128: New structures - permitted activity The placement of a ~~new structure, including~~ sediment retention weirs, pipeline~~s~~ (such as a natural gas pipeline), ducts, cables, **National Grid transmission line,** hydrological and water quality monitoring equipment, fences, ~~erosion protection structures~~, debris arrestor structures or a ~~and~~ structure**s** associated with **vegetative bank edge protection** ~~except a structure permitted by Rules R125, R126 and R127 and passive flap gates~~, that is fixed in, on, under, or over the bed of any river or lake, ~~excluding activities regulated by the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017 except general condition 5.4.4(n),~~ including any associated:

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					(a) disturbance of the river or lake bed, and (b) deposition on the river or lake bed, and (c) diversion of water, and (d) discharge of sediment to water, and (e) temporary damming of water, excluding activities regulated by the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017 except when general condition 5.4.4(n) applies, is a permitted activity, provided the following conditions are met: (f) the activity shall comply with the beds of lakes and rivers general conditions specified above in Section 5.4.4, and (g) the activity does not occur within a site identified in Schedule C (mana whenua), excluding adding pipelines, ~~or~~ cables, **or National Grid transmission lines** to an existing structure or providing for fish refuge, and (h) the activity does not occur in or on any part of the river bed identified as inanga spawning habitat in Schedule F1 (rivers/lakes), and (i) the structure does not occupy a bed area any greater than 10m², except for where the structure is associated with vegetative bank edge protection, or a pipeline, duct, fence, ~~or~~ cable, **or National Grid transmission line** which is located over or under the bed where no bed occupancy limits apply, and (j) the catchment upstream of any sediment retention weir is not greater than 200ha, and (k) the height of any sediment retention weir from the upstream base to the crest of the weir at the time of construction shall be no more than 0.5m, and (l) the placement of a weir other than a customary weir, in, on over or under the bed of any river or connected area must also comply with the following: (i) the fall height of the weir must be no more than 0.5m, and (ii) the slope of the weir must be no steeper than 1:30, and

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					(iii) the face of the weir must have roughness elements that are mixed grade rocks of 150 to 200mm diameter and irregularly spaced no more than 90mm apart to create a hydraulically diverse flow structure across the weir (including any wetted margins), and (iv) the weir's lateral profile must be V-shaped, sloping up at the banks, and with a low-flow channel in the centre, with the lateral cross-section slope between 5° and 10°, and (m) for all new weirs (except customary weirs), non-passive flap gates, aprons and ramps, placed in rivers or connected areas, the information requirements of Regulations 62, 64, 65, and 68 as relevant for the structure, of the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 shall be provided as set out in the regulations. ~~Note~~ ~~The placement of a passive flap gate in, on, over or under the bed of any river or connected area is a non-complying activity regulated by the Resource Management (National Environment Standards for Freshwater) Regulations 2020.~~
S177.018	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai	Amend	Supports progressive improvement of the health and wai ora of freshwater bodies and the coastal marine area. Considers restoration of natural character in relation to all freshwater bodies and coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure is located over or within freshwater bodies or the coastal marine area. Achieving restoration of natural character implies existing regionally significant infrastructure may need to be removed, and new regionally significant infrastructure may be inappropriate. Considers the objective should acknowledge complete restoration of character may not be possible in all instances, particularly as it relates to regionally significant infrastructure. Notes clause	Objective WH.O1 The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100. Note In the wai ora state: Āhua (natural character) is restored **to the extent that this is possible,** and freshwater bodies exhibit their natural quality, rhythms, range of flows, form, hydrology and character All freshwater bodies have planted margins All freshwater bodies and coastal waters have healthy functioning ecosystems and their water conditions and habitat support the presence, abundance, survival and

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		ora by 2100.		3.3(2) of NPS-FM requires long-term visions for freshwater to be ambitious but reasonable.	recovery of At-risk and Threatened species and taonga species Mahinga kai and kaimoana species are healthy, plentiful enough for long term harvest and are safe to harvest and eat or use, including for manuhiri and to exercise manaakitanga Mana whenua are able to undertake customary practices at a range of places throughout the catchment.
S177.019	8 Whaitua Te Whanganui-a-Tara	8.2 Policies	Support	Supports note as it provides for a range of existing operative policies to continue applying within the whaitua.	Retain as notified
S177.020	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	Considers policy is inappropriate because definition of "unplanned greenfield development" is broad, uncertain, and could prohibit maintenance, upgrading and development of regionally significant infrastructure. Considers prohibition on unplanned greenfield development is inappropriate and must be removed. If relief sought by submitter on the definition of "unplanned greenfield development" is granted in full, submitter would adopt a neutral position on this aspect of policy. Considers amendment to policy is necessary to ensure it is consistent with effects management hierarchy set out in NPS-FM. Aquatic offsetting is only necessary where residual adverse effects are more than minor, and resource consent applicants should be encouraged to minimise residual adverse effects so they are no more than minor (in which case aquatic offsetting is not required). Considers if aquatic offsetting is required, financial contributions as proposed by PC1 should be available as a discretionary option for achieving offsetting, but not a mandatory requirement. If applicants can provide alternative effective methods of aquatic offsetting as part of proposal in accordance with Appendix 6 of NPS-FM, then financial contributions should not be required.	Amend as follows: Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (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 (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous

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					vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.
S177.021	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Amend	Considers it impracticable to avoid contaminants being entrained in stormwater and notes this is acknowledged in section 32 report and by policies such as WH.P15. Focus of the policy is on management of hazardous substances prepared, used or stored at high risk industrial and trade premises, so reference to contaminants generally should be removed from the policy, in order that the policy is implementable and retains clear focus on the management of hazardous substances. Notes management of stormwater contaminants generally is provided for under policies WH.P10 and WH.P14, which will also apply to high risk industrial or trade premises.	Amend policy as follows: Policy WH.P11: Discharges of ~~contaminants~~ **hazardous substances** in stormwater from high risk industrial or trade premises The discharge of stormwater to water, including discharges via the stormwater network, from a high risk industrial or trade premise shall be managed by: (a) having procedures and equipment in place to contain any spillage of hazardous substances for storage or removal, and (b) avoiding ~~contaminants~~ ~~or~~ hazardous substances being entrained in stormwater and discharged to a surface water body or coastal water, including via the stormwater network, or where avoidance is not practicable, implementing good management practice to avoid or minimise adverse effects on the environment, including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and (c) installing an interceptor where there is a risk of petroleum hydrocarbons entering into the stormwater network, a surface water body or coastal water, and (d) avoiding or mitigating adverse effects of stormwater discharges on groundwater quality
S177.022	8 Whaitua Te	Policy WH.P14: Stormwate	Amend	Notes raingardens and bioretention devices are not defined terms in the plan and both terms need to be added to Plan to provide certainty for users.	Amend the definitions section to include a definition of "raingarden" and "bioretention device".

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	Whanganui-a-Tara	r discharges from new and redeveloped impervious surfaces.			
S177.023	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Amend	Considers policy be amended so that its consistent with effects management hierarchy set out in NPS-FM, which requires aquatic offsetting or compensation is provided in circumstances where residual adverse effects are more than minor. Considers financial contributions should not be a mandatory means of providing aquatic offsetting, and resource consent applicants should have reasonable opportunity to provide aquatic offsetting or compensation in accordance with Appendix 6 or 7 of NPS-FM as part of proposals.	Amend as follows: Policy WH.P15: Stormwater contaminant offsetting **or compensation** for new greenfield development ~~The~~ **More than minor** adverse effects of residual (post-treatment) stormwater contaminants from new greenfield development, roads (not already captured as part of a greenfield development) and state highways where the discharge will enter a surface water body or coastal water, including via an existing or new stormwater network, are to be offset by way of: **(a) aquatic offsetting or compensation in accordance with Appendix 6 or 7 of the National Policy Statement on Freshwater Management 2020; or** **(b)** a financial contribution in accordance with Schedule 30 (financial contribution).
S177.024	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Oppose	Considers the definition of unplanned greenfield development is too broad and uncertain. Unclear if all development is prohibited or just specific kinds of urban development. Concerns the approach could prohibit works on regionally significant infrastructure (including the National Grid) in areas identified as "unplanned greenfield development areas". Concerned that the policies and rules of "unplanned greenfield development areas" may capture works on the national grid which would be contrary to Policy 14 and the objective of the NPSET. Questions the efficiency and practicability of the proposed approach which creates jurisdictional overlap between territorial authorities, the regional	Delete policy.

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				council, and the Minister of Conservation)on the management of development in "unplanned greenfield development areas". Noting decisions on separate plan changes must be made separately and considers this will be highly inefficient for applicants and submitters and applicants and risks inconsistency. Considers the appropriate means of providing for a combined regulatory approach is through a combined planning document to address the issue, as per section 80 of the RMA. Considers the appropriate means of providing for a combined regulatory approach is through a combined planning document to address the issue, as per section 80 of the RMA. If the relief sought by submitter on definition of "unplanned greenfield development" is granted in full, submitter would consider adopting a neutral position on rule.	
S177.025	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Amend	Considers word "risk" should be replaced with "adverse effects" in chapeau, on basis that resource management policies should seek to manage actual or potential adverse effects of an activity, rather than risks generally. Considers requirement to retain soil and sediment on site under clause (a) does not recognise that soil and sediment may need to be removed from site in a controlled manner. Considers clause (a) should be amended to seek uncontrolled loss of soil and sediment from site is minimised, rather than requiring all soil and sediment to be retained on site. Considers clause (b) be qualified with "where practicable" to recognise any limits placed on land disturbance are reasonable and proportionate, particularly in context of good management practices already required by clause (a).	Policy WH.P29: Management of earthworks The ~~risk~~ **adverse effects** of sediment discharges from earthworks shall be managed by: (a) ~~requiring retention~~ **minimising the uncontrolled loss** of soil and sediment on the land using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), for the duration of the land disturbance, and (b) limiting, **where practicable,** the amount of land disturbed at any time, and (c) designing and implementing earthworks with knowledge of the existing environmental site constraints, specific engineering requirements and implementation of controls to limit the discharge of sediment to receiving environments, and (d) requiring erosion and sediment control measures to be installed prior to, and during earthworks and ensuring those

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					controls remain in place and are maintained until the land is stabilised against erosion.
S177.026	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Support	Considers standards set out in the policy to be reasonable.	Retain as notified
S177.027	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose	Considers a policy requiring all earthworks over 3,000m2 to be shut down over the winter months is inappropriate, as it does not recognise there may be circumstances where earthworks need to occur over those months in order to provide for safe and efficient operation, maintenance, upgrading, or development of regionally significant infrastructure. Considers there are instances where earthworks are unavoidable at this time, and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Notes GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), which is referred to in the policy, provides a pathway for earthworks to be undertaken during the winter months subject to careful management and considers pathway should continue to be available to applicants through consent process.	Delete policy.
S177.028	8 Whaitua Te Whanganui-a-Tara	8.3 Rules	Amend	Seeks reference to NESETA to highlight to plan users and assist with plan interpretation. Considers it relevant given the potential difference in standards and activity status.	Insert the following to the Interpretation section of the chapter: **Many activities relating to the operation, maintenance, upgrading, relocation or removal of an electricity transmission line and ancillary structures that existed prior to 14 January 2010 are controlled by the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA), separate to this Plan. Where the provisions**

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					of this Plan conflict with the requirements of the NESETA, the provisions of the NESETA apply.
S177.029	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Amend	Considers permitted activity conditions reasonable on the basis they are consistent with conditions for discharges to surface water or coastal water under the operative NRP. Considers note at the end of the rule should be amended to improve clarity. Also considers reference to "redeveloped premises" be removed, as it is addressed through separate rule cascade related to new or redeveloped impervious surfaces (rules R5 to R7).	Amend as follows: Rule WH.R2: Stormwater to land The discharge of stormwater onto or into land, including where contaminants may enter groundwater: (a) that is not from a high risk industrial or trade premise, or (b) that does not discharge from, or to, a local authority stormwater network, is a permitted activity provided the following conditions are met: (c) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (d) the discharge shall not cause or exacerbate the flooding of any other property, and (e) the discharge is not located within 20m of a bore used for water abstraction for potable supply or stock water. Note In respect of a discharge **of stormwater** from an existing high risk industrial or trade premise refer to Rule WH.R4, and for discharges **of stormwater** from new ~~or redeveloped premises~~ **high risk industrial or trade premises** refer to Rule WH.R11. For existing discharges from or into a local authority stormwater network refer to Rule WH.R9.
S177.030	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual property to surface	Amend	Considers permitted activity conditions reasonable on basis they are consistent with conditions for discharges to surface water or coastal water under operative NRP. Considers note at the bottom of the rule should be amended to improve its clarity.	Amend as follows: Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water The discharge of stormwater from an existing individual property into water, or onto or into land where it may enter a surface water body or coastal water,

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		water or coastal water - permitted activity.			(a) that is not from a high risk industrial or trade premise, or (b) that is not from a port, airport or state highway, or (c) that does not discharge from, or to, a local authority stormwater network, is a permitted activity, provided the following conditions are met: (d) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (e) the discharge does not contain wastewater, and (f) the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and (g) the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (h) the discharge shall not give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life.

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					Note In respect of the discharge **of stormwater** from an existing high risk industrial or trade premise refer to Rule WH.R4. Discharges from a port or airport refer to Rule WH.R8. For discharges from an existing individual property into the stormwater network refer to Rule WH.R9.
S177.031	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Amend	Considers limiting application of rule to existing high risk industrial or trade premises would result in new substations or switchyards for National Grid being a discretionary activity under rule WH.R11. Considers this inappropriate as it does not give effect to policy 2 of NPSET. Subject to amendments to condition (d), considers the conditions are appropriate to manage the potential adverse effects associated with stormwater discharges from existing or new high risk industrial or trade premises, and considers both should be provided for under same rule. Considers condition (d) of rule should be amended to remove reference to contaminants and retain a focus on hazardous substances. Considers the term "contaminants" is too broad and given purpose of managing high risk industrial or trade premises is to manage potential adverse effects associated with discharge hazardous substances, it is appropriate condition (d) manages only hazardous substances, rather than contaminants more broadly (which are managed under the remainder of the conditions). Considers note at the end of rule be deleted as part of giving effect to relief sought in this submission, as well as relief sought by submitter in relation to rules for new or redeveloped impervious surfaces.	Rule WH.R4: Stormwater from a ~~n existing~~ high risk industrial or trade premise The discharge of stormwater from a ~~n existing~~ high risk industrial or trade premise, that is not a port or airport, into water, or onto or into land where it may enter water, including via an existing local authority stormwater network, is a permitted activity, provided the following conditions are met: (a) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (b) the discharge does not contain wastewater, and (c) if the discharge is to land where it may enter groundwater, (i) the discharge cannot cause or exacerbate the flooding of any other property, and (ii) the discharge is not located within 20m of a bore used for water abstraction for potable supply or stock water, and (d) any ~~contaminants stored or used on site, or~~ hazardous substances **stored or used on site,** cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or (i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or (ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre

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					of total petroleum hydrocarbons, and (e) if the discharge is into a surface water body, coastal water or via an existing local authority stormwater network, the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and where the discharge is not via an existing local authority stormwater network the discharge shall also not: (f) cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (g) give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life. ~~Note~~ ~~For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to WH.R11.~~
S177.032	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and	Amend	Notes rule makes new impervious surfaces at high risk industrial or trade premises a discretionary activity under rule WH.R11. Considers this inappropriate in context of policy 2 and policy 5 of NPSET. Considers it could lead to perverse	Amend as follows: Rule WH.R5: Stormwater from new and redeveloped impervious surfaces

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		redeveloped impervious surfaces - permitted activity.		environmental outcomes, where impervious surfaces are left to degrade as redevelopment of the surface would require a discretionary activity consent. Considers it necessary to provide for new and redeveloped impervious surfaces as permitted or controlled activity under rules WH.R5, WH.R6 and WH.R7, subject to appropriate conditions. Considers additional conditions under (d) of rule WH.R4 are appropriate to manage potential adverse effects associated with hazardous substances and considers these be incorporated into rule WH.R5. Considers a fixed baseline in condition (a) would be unworkable as it could result in consecutive redevelopment of same impervious surfaces being a controlled or discretionary activity, even where surface is less than 1,000m2. Concerns how compliance with fixed baseline will be monitored with respect to redevelopment (as this cannot be readily measured). Considers a 12-month time period, similar to that used for earthworks, would be more appropriate as it provides greater certainty to applicants, is more readily implementable, and is able to be effectively monitored. Considers Condition (c)(ii) SHould be amended so hydrological control is only required for new impervious surfaces, as redevelopment of existing impervious surfaces will not change quantity of runoff from impervious surfaces. Seeks references to "impervious areas" (undefined) in conditions (c)(i) and (ii) be replaced with "impervious surfaces" (defined) and minor amendments made to condition (c)(ii) to improve the clarity of condition.	The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or new local authority stormwater network, that is not ~~a high risk industrial or trade premise or~~ unplanned greenfield development, is a permitted activity, provided the following conditions are met: (a) the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m2 ~~(baseline property existing impervious area as at 30 October 2023)~~ **per property in any consecutive 12-month period** and (b) all new building materials associated with the development shall not include exposed zinc (including galvanised steel) or copper roof, cladding and spouting materials, and (c) the proposal provides hydrological control measures (for example rain tanks) onsite or offsite, where discharges will enter a surface water body (including via an existing local authority stormwater network): (i) for all ~~impervious areas~~ **impervious surfaces** associated with a greenfield development, or (ii) for all ~~redeveloped and~~ new ~~impervious areas~~ **impervious surfaces** ~~involving~~ greater than 30m2 ~~of impervious area of a~~ **associated with** redevelopment (of an existing urbanised property), and (d) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (e) the discharge does not contain wastewater, and (f) the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4

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					(coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and where the discharge is not via an existing or new local authority stormwater network: (g) the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (h) the discharge shall not give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life **.,** **and where the new or redeveloped impervious surface is for a high risk industrial or trade premise:** **(i) any hazardous substances stored or used on site cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or** **(i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or** **(ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons.** Note Where a property connects to a local authority stormwater network, additional connection requirements and

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					authorisations may be required by the network utility operator.~~For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to WH.R11.~~
S177.033	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Notes the rule makes new impervious surfaces at high risk industrial or trade premises a discretionary activity under rule WH.R11. Considers this inappropriate in the context of policy 2 of NPSET. Considers it necessary to provide for new and redeveloped impervious surfaces as permitted or controlled activity under rules WH.R5, WH.R6 and WH.R7, subject to appropriate conditions. Considers additional conditions under (d) of rule WH.R4 are appropriate to manage potential adverse effects associated with hazardous substances and considers these be incorporated into rule WH.R5. As per submission on policy WH.P15, submitter considers it not consistent with the NPS-FM to require mandatory financial contributions for purposes of aquatic offsetting, as the effects management hierarchy in NPS-FM only requires offsetting in circumstances where residual adverse effects are more than minor. Where residual adverse effects are more than minor, applicants should have opportunity to propose aquatic offsetting or compensation in accordance with Appendix 6 or 7 of NPS-FM. Considers it is inappropriate to require financial contributions as a condition, and instead, matter of control 6 should be amended to refer to policy WH.P15. This ensures appropriate aquatic offsetting or compensation (which may include financial contributions under Schedule 30) can be considered on a case by case basis, where required. Considers a fixed baseline in condition (a) would be	Amend rule as follows: Rule WH.R6: Stormwater from new greenfield impervious surfaces The use of land for the creation of new impervious surfaces for greenfield development and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not ~~a high risk industrial or trade premise or~~ unplanned greenfield development, is a controlled activity, provided the following conditions are met: (a) the proposal involves the creation of new impervious surfaces of between 1,000m2 and 3,000m2 ~~(baseline property existing impervious area as at 30 October 2023)~~ **per property in any consecutive 12-month period** or, (b) the proposal involves the creation new impervious surfaces of less than 1,000m2, but is not permitted under the conditions of Rule WH.R5, and,~~(c) a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions), and~~ (d) where stormwater directly or indirectly (through an existing local authority stormwater network) discharges to a river, hydrological control is provided either: (i) on-site, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has

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				unworkable as it could result in consecutive redevelopment of same impervious surfaces being a controlled or discretionary activity, even where surface is less than 1,000m2. Concerns how compliance with fixed baseline will be monitored with respect to redevelopment (as this cannot be readily measured). Considers a 12-month time period, similar to that used for earthworks, would be more appropriate as it provides greater certainty to applicants, is more readily implementable, and is able to be effectively monitored.	been sized to accommodate the proposed stormwater discharges, and (e) stormwater contaminant treatment is provided that captures 85% of the mean annual runoff and directs it to a stormwater treatment system that treats in accordance with Schedule 28 (contaminant treatment) and is provided either: (i) on-site, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater treatment system that has capacity to treat contaminant loads from the site **., and where the new impervious surface is for a high risk industrial or trade premise:** **(f) any hazardous substances stored or used on site cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or** **(i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or** **(ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons.** Matters of control 1. The design and layout of the on-site stormwater treatment system, including the ongoing operational and management measures necessary to ensure that stormwater quality will meet the requirements of condition (e) of this rule 2. The adequacy of hydrological control measures either on-site or off- site, where stormwater will enter a river 3. Where an off-site (or a combination of on-site and off-site) stormwater treatment system is utilised, whether this has capacity, availability timing) and appropriate authorisations to connect into 4. The long-term operational, maintenance and ownership requirements of the stormwater treatment system 5. Whether sufficient use of water sensitive urban design measures have been applied to the site design and layout

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					6. ~~A financial contribution as required by Schedule 30 (financial contributions)~~ **Any aquatic offsetting or compensation proposed in accordance with policy WH.P15** **7. For high risk industrial or trade premises, the adequacy of any proposed containment system, interceptor system, or other proposed methods for the management of hazardous substances** 8. Condition of consent to demonstrate and/or monitor compliance with conditions (d)~~, and~~ (e), **and (f)** of this rule Notification In respect of Rule WH.R6, applications are precluded from limited and public notification (unless special circumstances exist). ~~Note~~ ~~For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to WH.R11.~~
S177.034	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Amend	Notes rule makes new impervious surfaces at high risk industrial or trade premises a discretionary activity under rule WH.R11. Considers this inappropriate in context of policy 2 and policy 5 of NPSET. Considers it could lead to perverse environmental outcomes, where impervious surfaces are left to degrade as redevelopment of the surface would require a discretionary activity consent. Considers it necessary to provide for new and redeveloped impervious surfaces as permitted or controlled activity under rules WH.R5, WH.R6 and WH.R7, subject to appropriate conditions. Considers additional conditions under (d) of rule WH.R4 are appropriate to manage potential adverse effects associated with hazardous substances and considers these be incorporated into rule WH.R5. Considers a fixed baseline in condition (a) would be	Amend rule as follows: Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas The use of land for the creation of new and/or redevelopment of impervious surfaces of an existing urbanised property and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, ~~that is not a high risk industrial or trade premise,~~ is a controlled activity, provided the following conditions are met: (a) the proposal involves the creation of new, or redevelopment of impervious surfaces of between 1,000m2 and 3,000m2 ~~(baseline property existing impervious area as at 30 October 2023)~~ **per property in any consecutive 12-month period**

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				unworkable as it could result in consecutive redevelopment of same impervious surfaces being a controlled or discretionary activity, even where surface is less than 1,000m2. Concerns how compliance with fixed baseline will be monitored with respect to redevelopment (as this cannot be readily measured). Considers a 12-month time period, similar to that used for earthworks, would be more appropriate as it provides greater certainty to applicants, is more readily implementable, and is able to be effectively monitored.	or, (b) the proposal involves the creation of new, or redevelopment of impervious areas of less than 1,000m2 but is not permitted under the conditions of Rule WH.R5, and, (c) where stormwater directly or indirectly (through an existing local authority stormwater network) discharges to a river, hydrological control is provided either: (i) on-site, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has been sized to accommodate the proposed stormwater discharges, and (d) contaminant treatment of stormwater is provided either: (i) on-site through a stormwater treatment system, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater treatment system that has capacity to treat contaminant loads from the site **and where the new or redeveloped impervious surface is for a high risk industrial or trade premise:** **(e) any hazardous substances stored or used on site cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or** **(i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or** **(ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons.** Matters of control 1. Whether the design and layout of the on-site stormwater treatment system incorporates best practicable option measures to achieve (to the extent practicable) the capture of 85% of the mean annual stormwater runoff and treatment in accordance with Schedule 28 (contaminant treatment) 2. Whether the design and layout undertakes a best

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					practicable option approach to the provision of hydrological control measures either onsite or offsite, where stormwater will enter a river 3. Where an off-site (or a combination of on-site and off-site) stormwater treatment system is utilised, whether this has capacity, availability (timing) and appropriate authorisations to connect into 4. The long-term operational, maintenance and ownership requirements of the stormwater treatment system 5. Whether there are topographical limitations influencing the provision of stormwater hydrological control and contaminant treatment 6. Whether sufficient use of water sensitive urban design methods have been applied to the site design and layout **7. For high risk industrial or trade premises, the adequacy of any proposed containment system, interceptor system, or other proposed methods for the management of hazardous substances** 8. Conditions to monitor compliance associated with any stormwater treatment system, ~~or~~ hydrological control measures, **or measures required under condition (e).** Notification In respect of Rule WH.R7, applications are precluded from limited and public notification (unless special circumstances exist). ~~Note~~ ~~For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to Rule WH.R11.~~
S177.035	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious	Amend	Opposes default discretionary activity status for new or redeveloped impervious surfaces at high risk industrial or trade premises (including National Grid substations), for reasons set out in its submission of rules WH.R5, WH.R6 and WH.R7. Considers a reasonable level of new or redeveloped impervious surfaces should be provided for as a permitted or controlled activity under rules WH.R5, WH.R6 and	Amend as follows: Rule WH.R11: Stormwater from new and redeveloped impervious surfaces The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised

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		surfaces - discretionary activity.		WH.R7, subject to appropriate conditions to manage the potential adverse effects associated with hazardous substances. As per submission on policy WH.P15, considers it is not consistent with NPS-FM to require mandatory financial contributions for purposes of aquatic offsetting, as the effects management hierarchy in NPS-FM only requires offsetting in circumstances where residual adverse effects are more than minor. Where residual adverse effects are more than minor, applicants should have opportunity to propose aquatic offsetting or compensation in accordance with Appendix 6 or 7 of the NPS-FM. Considers it inappropriate to require financial contributions as a condition. Where aquatic offsetting or compensation (which may include financial contributions under Schedule 30) is considered to be necessary, this can be provided for as a condition of consent with reference to requirements of policy WH.P15.	property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or Rule WH.R7, or prohibited under WH.R13 is a discretionary activity provided the following condition~~s are~~ **is** met: (a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), ~~and.~~ ~~(b) if the proposal is for greenfield development a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions).~~
S177.036	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Amend	Considers the move to non-complying activity status for all other stormwater discharges is not clearly explained or justified in section 32 report. Concerned with the jump between permitted activity status for stormwater discharges under rules WH.R2, WH.R3, and WH.R4, and non-complying activity status under this rule. Minor non-compliances with conditions under these rules will trigger the non-complying activity rule. Non-complying activity status for minor breaches of rule conditions can be a particular issue for development or upgrading of the National Grid. Considers this leads to a high degree of uncertainty as to whether consents for development or upgrading of the National Grid will be granted under section 104D of RMA, even where minor non-compliances with stormwater conditions under rules	Amend rule as follows: Rule WH.R12: All other stormwater discharges - ~~non-complying~~ **discretionary** activity The: (a) discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule WH.R2, or (b) discharge of stormwater into water or onto or into land where it may enter a surface water body or coastal water, that is not permitted by Rule WH.R3, or a restricted discretionary activity under Rules WH.R8 or WH.R9, or (c) discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule WH.R4, ~~or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade premise that~~

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				WH.R2, WH.R3, or WH.R4 can be appropriately addressed through consent conditions. Considers this does not appropriately give effect to policy 2 of NPSET. Considers non-complying activity rule is not sufficiently justified in section 32 report and does not appropriately provide for activities that do not meet permitted activity conditions, but which can otherwise be managed through consent conditions as a discretionary activity. Submitter does consider that non-complying activity status should be retained for proposals that do not provide a Stormwater Impact Assessment under rule WH.R11, as this would clearly be contrary to objectives and policies of the Plan.	~~does not meet the conditions of Rule WH.R11, or (d) use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater into water or onto or into land where it may enter water, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or WH.R7, or a discretionary activity under Rule WH.R10 or WH.R11, or a prohibited activity under WH.R13,~~ is a ~~non-complying~~ **discretionary** activity. As a consequential amendment, provide a new non-complying activity rule for stormwater discharges that are not a discretionary activity under rule WH.R11.
S177.037	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Considers the definition of unplanned greenfield development is too broad and uncertain. Unclear if all development is prohibited or just specific kinds of urban development. Concerns the approach could prohibit works on regionally significant infrastructure (including the National Grid) in areas identified as "unplanned greenfield development areas". Concerned that the policies and rules of "unplanned greenfield development areas" may capture works on the national grid which would be contrary to Policy 14 and the objective of the NPSET. Questions the efficiency and practicability of the proposed approach which creates jurisdictional overlap between territorial authorities, the regional council, and the Minister of Conservation)on the management of development in "unplanned greenfield development areas". Noting decisions on separate plan changes must be made separately and considers this will be highly inefficient for applicants and submitters and applicants and risks inconsistency. Considers the appropriate means of providing for a combined regulatory approach is	Delete rule.

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				through a combined planning document to address the issue, as per section 80 of the RMA. Considers the appropriate means of providing for a combined regulatory approach is through a combined planning document to address the issue, as per section 80 of the RMA. If the relief sought by submitter on definition of "unplanned greenfield development" is granted in full, submitter would consider adopting a neutral position on rule.	
S177.038	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity.	Amend	Notwithstanding concerns raised in this submission regarding the mapping of 'highest erosion risk land (woody vegetation)', submitter seeks amendment to R17. Regular vegetation clearance to prevent vegetation from encroaching on National Grid transmission lines and structures (beyond that provided in Electricity (Hazards from Trees) Regulations 2003) is a necessary part of maintaining safe and efficient operations of electricity transmission network. Providing for vegetation clearance underneath or near National Grid transmission lines or structures as a permitted activity is necessary in order to give effect to policy 5 of NPSET, which requires that the reasonable operational and maintenance requirements of the National Grid are provided for, and policy 10 of NPSET, which requires operation and maintenance of electricity transmission network is not compromised. Seeks to add a subclause to clause (a) to clarify that vegetation clearance of less than 200m2 per property per year is permitted activity (on the basis that clearance of more than 200m2 is a controlled activity under rule WH.R18). Considers it necessary to avoid clearance of less than 200m2 becoming an innominate activity (and therefore discretionary).	Amend rule as follows: Rule WH.R17: Vegetation clearance on highest erosion risk land Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a surface water body is a permitted activity provided the following conditions are met: (a) the vegetation clearance is: (i) **for no more than a total area of 200m2 per property in any consecutive 12-month period, or** (ii) to implement an action in the erosion risk treatment plan for the farm, or (iii) for the control of pest plants, ~~and~~ **or** **(iv) for the purposes of operating or maintaining the National Grid, and** (b) debris from the vegetation clearance is not placed where it can enter a surface water body. In addition to this, reallocate the rule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.

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				Clarification is sought as to how the 200m2 is calculated - is it the identified woody vegetation or on a site which contains an area of woody vegetation. Opposes rule being included within freshwater planning instrument, as the purpose of rule is to manage land use for purposes of soil conservation and seeks that it be reallocated to Part 1 Schedule 1 planning instrument.	
S177.039	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land - controlled activity.	Amend	Subject to submitters relief being granted on rule WH.R17 (submission point 42) submitter is neutral on rule, noting NESETA regulation 32 would apply (and prevail) where works are not permitted. Considers the rehabilitation of areas of cleared vegetation (under matter of control 3) should not be undertaken in a manner or in locations where vegetation would encroach on National Grid lines or structures. Considers that an additional matter of control is necessary to address this matter. Opposes rule being included within freshwater planning instrument, as purpose of rule is to manage land use for purposes of soil conservation and seeks that it be reallocated to Part 1 Schedule 1 planning instrument.	Amend rule as follows: Rule WH.R18: Vegetation clearance on highest erosion risk land Vegetation clearance on highest erosion risk land (woody vegetation), of more than a total area of 200m2 per property in any consecutive 12-month period, and any associated discharge of sediment to a surface water body is a controlled activity provided an erosion and sediment management plan has been prepared in accordance with Schedule 33 (vegetation clearance plan) and submitted with the application for resource consent under this Rule. Matters of control 1. The content of the erosion and sediment management plan, including the actions, management practices and mitigation measures necessary to ensure that discharge of sediment will not exceed that which occurred from the land prior to the vegetation clearance occurring 2. The area, location and method of vegetation clearance 3. Stabilisation and rehabilitation of the area cleared 4. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent (including auditing of information) to demonstrate and/or monitor compliance with the resource consent and the erosion and sediment management plan 5. The timing, frequency and requirements for review, audit

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					and amendment of the erosion and sediment management plan 6. The time and circumstances under which the resource consent conditions may be reviewed **7. The need for any rehabilitated areas of vegetation to be clear of National Grid transmission lines and support structures.** In addition to this, reallocate the rule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.
S177.040	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance - discretionary activity.	Oppose	Subject to Transpower's relief being granted on rule WH.R17 (submission point 44) submitter is neutral on rule, noting NESETA regulation 32 would apply (and prevail) where works are not permitted. Opposes rule being included within freshwater planning instrument, as purpose of rule is to manage land use for purposes of soil conservation and seeks that it be reallocated to Part 1 Schedule 1 planning instrument.	Reallocate the rule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.
S177.041	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	Notes effect of use of "and" at the end of condition (b) is to exclude all earthworks not related to implementing farm erosion risk treatment plans or farm environmental plans from the permitted activity rule. As a result, all other earthworks, regardless of size or whether they meet conditions (c) to (h) will be a restricted discretionary activity under rule WH.R24. Considers this is an error and acknowledges Council have corrected this under clause 16 of Schedule 1 to the RMA by way of a memo published on 6 December 2023. Submitter has submitted on the rule as notified. Notes Council's proposed approach is to remove associated discharges from earthworks rule, and instead, discharges associated with earthworks are permitted under separate "minor discharges" rule (R91). Given that rule WH.R23 is not a discharge	Amend rule as follows: Rule WH.R23: Earthworks Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, ~~and~~ **or** (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can

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				rule, submitter considers it should not include condition (g), which is a discharge condition. Considers condition (g) inappropriate as it is not consistent with the minor discharges rule, which permits a minor discharge of suspended solids to surface water bodies or coastal water. Considers that given minor discharges rule provides for discharge of suspended solids, condition (h) be amended to reflect purpose of erosion and sediment control is to prevent uncontrolled discharge of sediment, rather than all discharge of sediment. Opposes rule being included within freshwater planning instrument, as purpose of rule is to manage land use for purposes of soil conservation. As rule does not provide for discharges associated with earthworks, there is no justification for including it in freshwater planning instrument, seeks that it be reallocated to Part 1 Schedule 1 planning instrument.	enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and~~(g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and~~ (h) erosion and sediment control measures shall be used to prevent ~~a~~ **the uncontrolled** discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021). In addition to this, reallocate the rule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.
S177.042	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	Considers chapeau of rule be restructured to locate "associated discharge" element of rule to follow on from "Earthworks that do not comply with Rule WH.R23" as discharges associated with permitted earthworks are not provided for under rule WH.R23 (which only permits earthworks). Discharges from permitted earthworks are instead provided for under the "minor discharges" rule R91. Considers a condition requiring earthworks be shut down over the winter months is inappropriate, as it does not recognise circumstances where earthworks need to occur over those months in order to provide for safe and efficient operation, maintenance, upgrading, or development of	Amend rule as follows: Rule WH.R24: Earthworks Earthworks ~~and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network,~~ that do~~es~~ not comply with Rule WH.R23, **and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network,** is ~~a~~ restricted discretionary activity, provided the following conditions are met:

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				regionally significant infrastructure (including the National Grid). Recognises earthworks should be planned so majority of bulk earthworks occur outside of winter months. Considers instances where earthworks are unavoidable and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Notes GWRC Erosion and Sediment Control Guideline for Wellington Region (2021), which is referred to in policy WH.P31 (and in the note to permitted activity rule WH.R23), provides a pathway for earthworks to be undertaken during winter months subject to careful management. Considers rather than a blanket restriction on all earthworks over this period, reference is made to matters set out under section G5.0 of guideline as a matter of discretion for earthworks. Considers this will ensure consistency between the rules and the Council's technical guidance for the management of earthworks, and provide for appropriate conditions to manage works over the winter period to be included in resource consents. Considers the note directing Plan users to GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021) that is included under permitted activity rule WH.R23 also be provided for under this rule.	(a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, ~~and~~ ~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~ Matters for discretion 1. The location, area, scale, volume, duration and staging and timing of works 2. The design and suitability of erosion of sediment control measures including consideration of hazard mitigation and the risk of accelerated soil erosion associated the staging of works and progressive stabilisation 3. The placement and treatment of stockpiled materials on the site, including requirements to remove material if it is not to be reused on the site 4. The proportion of unstabilised land in the catchment 5. The adequacy and efficiency of stabilisation devices for sediment control 6. Any adverse effects on: (i) groundwater, surface water bodies and their margins, particularly surface water bodies within sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori customary use) or Schedule I (important trout fishery rivers and spawning waters) (ii) group drinking water supplies and community drinking water supplies (iii) mauri, water quality (including water quality in the coastal

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					marine area), aquatic and marine ecosystem health, aquatic and riparian habitat quality, indigenous biodiversity values, mahinga kai and critical life cycle periods for indigenous aquatic species (iv) the natural character of lakes, rivers, natural wetlands and their margins and the coastal environment (v) natural hazards, land stability, soil erosion, sedimentation and flood hazard management including the use of natural buffers 7. Duration of the consent ~~8. Preparation required for the close-down period (from 1st June to 30th September each year) and any maintenance activities required during this period~~ **Where earthworks will be undertaken within the period from 1 June to 30 September, the matters set out under section G5.0 of the Greater Wellington Regional Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021)** 9. Monitoring and reporting requirements **Note** **Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).**
S177.043	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Amend	Considers that the move to non-complying activity status for all other earthworks is not clearly explained or justified in the section 32 evaluation report. Non-compliance with conditions under rule WH.R25 will trigger the non-complying activity rule. Non-complying activity status for minor breaches of rule conditions can be a particular issue for development or upgrading of the National Grid. This leads to a high degree of uncertainty as to whether consents for development or upgrading of the National Grid will be granted under section 104D of RMA, even where adverse effects of the part of the	Amend rule as follows: Rule WH.R25: Earthworks - ~~non-complying~~ **discretionary** activity Earthworks, and the associated discharge of sediment into a surface water body or coastal water or onto or into land where it may enter a surface water body or coastal water from earthworks, including via a stormwater network, that does not comply with Rule WH.R24 is a ~~non-complying~~ **discretionary** activity.

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				proposal that triggered non-complying activity status can be appropriately addressed through consent conditions. This does not appropriately give effect to policy 2 of NPSET, as it does not provide for the effective upgrading and development of the electricity transmission network. Considers the non-complying activity rule is not sufficiently justified in section 32 report and does not appropriately provide for activities that do not meet restricted discretionary activity conditions, but which can otherwise be managed through consent conditions as a discretionary activity.	
S177.044	9 Te Awarua-o-Porirua Whaitua	Objective P.O1: The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100.	Amend	Supports progressive improvement of the health and wai ora of freshwater bodies and the coastal marine area. However, restoration of natural character in relation to all freshwater bodies and coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure is located over or within freshwater bodies or the coastal marine area. Achieving restoration of natural character implies existing regionally significant infrastructure may need to be removed, and new regionally significant infrastructure may be inappropriate. Considers the objective should acknowledge complete restoration of character may not be possible in all instances, particularly as it relates to regionally significant infrastructure. Considers that clause 3.3(2) of NPS-FM requires long-term visions for freshwater to be ambitious but reasonable (that is, difficult to achieve but not impossible), and considers objective needs to be amended to recognise this.	Amend objective as follows: Objective P.O1 The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100. Note In the wai ora state: Te Awarua-o-Porirua is a taonga of Ngāti Toa Rangatira and must be respected by others Mauri is restored and waters are in a natural state, **to the extent that this is possible** Ecological health is excellent in freshwater and coastal water environments Rivers flow naturally, with ripples and the river beds are stony Mahinga kai, taonga, mahinga ika and kaimoana species are healthy, abundant, diverse, present across all stages of life, sizeable, and able to be culturally harvested by mana whenua

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					Mahinga kai, taonga, mahinga ika and kai moana species are safe to harvest and eat or use, including for mana whenua to exercise manaakitanga Mana whenua and communities are able to undertake a full range of activities Mana whenua are able to undertake cultural activities and practices
S177.045	9 Te Awarua-o-Porirua Whaitua	9.2 Policies	Support	Supports the note as it provides for a range of existing operative policies to continue to apply within the whaitua.	Retain as notified
S177.046	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	Considers policy is inappropriate because definition of "unplanned greenfield development" is broad, uncertain, and could prohibit maintenance, upgrading and development of regionally significant infrastructure (including the National Grid) and considers that the prohibition on unplanned greenfield development is inappropriate and must be removed. If relief sought by submitter on the definition of "unplanned greenfield development" is granted in full, submitter would adopt a neutral position on this aspect of policy. Considers amendment to policy is necessary to ensure it is consistent with effects management hierarchy set out in NPS-FM. Aquatic offsetting is only necessary where residual adverse effects are more than minor, and resource consent applicants should be encouraged to minimise residual adverse effects so they are no more than minor (in which case aquatic offsetting is not required). Further, if aquatic offsetting is required, financial contributions as proposed by PC1 should be available as a discretionary option for achieving offsetting, but not a mandatory requirement. If applicants can provide alternative effective methods of aquatic offsetting as part of proposal in accordance with Appendix 6 of	Amend policy as follows: Policy P.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (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 (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers, and (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and

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				NPS-FM, then financial contributions should not be required.	(f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.
S177.047	9 Te Awarua-o-Porirua Whaitua	Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises.	Amend	Considers it impracticable to avoid contaminants being entrained in stormwater and notes this is acknowledged in section 32 report and by policies such as P.P14 which recognises potential for residual stormwater contaminants associated with development. Focus of the policy is on management of hazardous substances prepared, used or stored at high risk industrial and trade premises, so reference to contaminants generally should be removed from the policy, in order that the policy is implementable and retains clear focus on the management of hazardous substances. Management of stormwater contaminants generally is provided for under policies WH.P10 and WH.P14, which will also apply to high risk industrial or trade premises.	Amend policy as follows: Policy P.P11: Discharges of ~~a contaminant~~ **hazardous substances** in stormwater from high risk industrial or trade premises The discharge of stormwater to water from a high risk industrial or trade premise shall be managed by: (a) having procedures and equipment in place to contain any spillage of hazardous substances for storage or removal, and (b) avoiding ~~contaminants~~ ~~or~~ hazardous substances being entrained in stormwater and discharged to a surface water body or coastal water, including via the stormwater network, or where avoidance is not practicable, implementing good management practice to avoid or minimise adverse effects on the environment including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and (c) installing an interceptor where there is a risk of petroleum hydrocarbons entering into the stormwater network, a surface water body or coastal water, and (d) avoiding or mitigating adverse effects of stormwater discharges on groundwater quality.
S177.048	9 Te Awarua-o-Porirua Whaitua	Policy P.P13: Stormwater discharges from new	Amend	Notes raingardens and bioretention devices are not defined terms in the plan and both terms need to be added to Plan to provide certainty for users.	Amend the definitions section to include a definition of "raingarden" and "bioretention device".

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		and redeveloped impervious surfaces.			
S177.049	9 Te Awarua-o-Porirua Whaitua	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Amend	Considers policy be amended so that its consistent with effects management hierarchy set out in NPS-FM, which requires aquatic offsetting or compensation is provided in circumstances where residual adverse effects are more than minor. Considers financial contributions should not be a mandatory means of providing aquatic offsetting, and resource consent applicants should have reasonable opportunity to provide aquatic offsetting or compensation in accordance with Appendix 6 or 7 of NPS-FM as part of proposals.	Amend policy as follows: Policy P.P14: Stormwater contaminant offsetting **or compensation** for new greenfield development ~~The~~ **More than minor** adverse effects of residual (post-treatment) stormwater contaminants from new greenfield development, roads (not already captured as part of a greenfield development) and state highways where the discharge will enter a surface water body or coastal water, including via an existing or new stormwater network, are to be offset by way of: **(a) aquatic offsetting or compensation in accordance with Appendix 6 or 7 of the National Policy Statement on Freshwater Management 2020; or** **(b)** a financial contribution in accordance with Schedule 30 (financial contribution).
S177.050	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Oppose	Considers the definition of unplanned greenfield development is too broad and uncertain. Unclear if all development is prohibited or just specific kinds of urban development. Concerns the approach could prohibit works on regionally significant infrastructure (including the National Grid) in areas identified as "unplanned greenfield development areas". Concerned that the policies and rules of "unplanned greenfield development areas" may capture works on the national grid which would be contrary to Policy 14 and the objective of the NPSET. Questions the efficiency and practicability of the proposed approach which creates jurisdictional overlap between territorial authorities, the regional council, and the Minister of Conservation)on the management of development in "unplanned greenfield development areas". Noting decisions on	Delete policy.

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				separate plan changes must be made separately and considers this will be highly inefficient for applicants and submitters and applicants and risks inconsistency. Considers the appropriate means of providing for a combined regulatory approach is through a combined planning document to address the issue, as per section 80 of the RMA. Considers the appropriate means of providing for a combined regulatory approach is through a combined planning document to address the issue, as per section 80 of the RMA. If the relief sought by submitter on definition of "unplanned greenfield development" is granted in full, submitter would consider adopting a neutral position on rule.	
S177.051	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Amend	Considers word "risk" should be replaced with "adverse effects" in chapeau, on basis that resource management policies should seek to manage actual or potential adverse effects of an activity, rather than risks generally. Considers requirement to retain soil and sediment on site under clause (a) does not recognise that soil and sediment may need to be removed from site in a controlled manner as part of works associated with maintenance, upgrading, or development of regionally significant infrastructure (including the National Grid). Considers clause (a) should be amended to seek uncontrolled loss of soil and sediment from site is minimised, rather than requiring all soil and sediment to be retained on site. Considers clause (b) be qualified with "where practicable" to recognise any limits placed on land disturbance are reasonable and proportionate, particularly in context of good management practices already required by clause (a).	Policy P.P27: Management of earthworks sites The ~~risk~~ **adverse effects** of sediment discharges from earthworks shall be managed by: (a) ~~requiring retention~~ **minimising the uncontrolled loss** of soil and sediment on the site using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021), for the duration of the land disturbance, and (b) limiting**, where practicable,** the amount of land disturbed at any time, and (c) designing and implementing earthworks with knowledge of the existing environmental site constraints, specific engineering requirements and implementation of controls to limit the discharge of sediment to receiving environments, and (d) requiring erosion and sediment control measures to be installed prior to, and during earthworks and ensuring those controls remain in place and are maintained until the land is stabilised against erosion.

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S177.052	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Support	Considers standards set out in the policy to be reasonable.	Retain as notified
S177.053	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose	Considers a policy requiring all earthworks over 3,000m2 to be shut down over the winter months is inappropriate, as it does not recognise there may be circumstances where earthworks need to occur over those months in order to provide for safe and efficient operation, maintenance, upgrading, or development of regionally significant infrastructure. Considers there are instances where earthworks are unavoidable at this time, and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Notes GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), which is referred to in the policy, provides a pathway for earthworks to be undertaken during the winter months subject to careful management and considers pathway should continue to be available to applicants through consent process.	Delete policy.
S177.054	9 Te Awarua-o-Porirua Whaitua	9.3 Rules	Amend	Seeks reference to NESETA to highlight to plan users and assist with plan interpretation. Considers it relevant given the potential difference in standards and activity status.	Insert the following to the Interpretation section of the chapter: **Many activities relating to the operation, maintenance, upgrading, relocation or removal of an electricity transmission line and ancillary structures that existed prior to 14 January 2010 are controlled by the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA), separate to this Plan. Where the provisions of this Plan conflict with the requirements of the NESETA, the provisions of the NESETA apply.**

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S177.055	9 Te Awarua-o-Porirua Whaitua	Rule P.R2: Stormwater to land - permitted activity.	Amend	Considers permitted activity conditions reasonable on the basis they are consistent with conditions for discharges to surface water or coastal water under the operative NRP. Considers note at the end of the rule should be amended to improve clarity. Considers note should be amended to reflect that rule P.R10 regulates discharges from new high risk industrial and trade premises (as opposed to new discharges from high risk industrial and trade premises, be they existing or new premises).	Amend rule as follows: Rule P.R2: Stormwater to land - permitted activity The discharge of stormwater onto or into land, including where contaminants may enter groundwater (a) that is not from a high risk industrial or trade premise, or (b) that does not discharge from, or to, a local authority stormwater network is a permitted activity provided the following conditions are met: (c) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (d) the discharge shall not cause or exacerbate the flooding of any other property, and (e) the discharge is not located within 20m of a bore used for water abstraction for potable supply or stock water. Note In respect of a discharge **of stormwater** from an existing high risk industrial or trade premise refer to Rule P.R4, and for ~~new~~ discharges **of stormwater from new high risk industrial or trade premises** refer to Rule P.R10. For existing discharges from or into a local authority stormwater network refer to Rule P.R5.
S177.056	9 Te Awarua-o-Porirua Whaitua	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Amend	Considers permitted activity conditions reasonable on basis they are consistent with conditions for discharges to surface water or coastal water under operative NRP. Considers note at the bottom of the rule should be amended to improve its clarity.	Amend rule as follows: Rule P.R3: Stormwater from an existing individual property to surface water or coastal water The discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, from an existing individual property (a) that is not from a high risk industrial or trade premise, or (b) that is not from a state highway, or (c) that does not discharge from, or to, a local authority stormwater network is a permitted activity, provided the following conditions are

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					met: (d) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (e) the discharge does not contain wastewater, and (f) the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and (g) the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (h) the discharge shall not give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life. Note In respect of the discharge **of stormwater** from an high risk industrial or trade premise refer to Rule P.R4. For discharges from an existing individual property into the stormwater network refer to Rule P.R5.

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S177.057	9 Te Awarua-o-Porirua Whaitua	Rule P.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Amend	Limiting application of rule to only existing high risk industrial or trade premises would result in new substations or switchyards for National Grid being a discretionary activity under rule P.R10. Considers this inappropriate as it does not give effect to policy 2 of NPSET. Subject to amendments to condition (d), considers the conditions are appropriate to manage the potential adverse effects associated with stormwater discharges from existing or new high risk industrial or trade premises, and considers both should be provided for under same rule. Considers condition (d) of rule should be amended to remove reference to contaminants and retain a focus on hazardous substances. The term "contaminants" is too broad and given purpose of managing high risk industrial or trade premises is to manage potential adverse effects associated with discharge hazardous substances, it is appropriate condition (d) manages only hazardous substances, rather than contaminants more broadly (which are managed under the remainder of the conditions). Considers note at the end of rule be deleted as part of giving effect to relief sought in this submission, as well as relief sought by submitter in relation to rules for new or redeveloped impervious surfaces.	Amend as follows: Rule P.R4: Stormwater from a~~n existing~~ high risk industrial or trade premise The discharge of stormwater from a~~n existing~~ high risk industrial or trade premise, into water, or onto or into land where it may enter water, including via an existing local authority stormwater network, is a permitted activity, provided the following conditions are met: (a) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (b) the discharge does not contain wastewater, and (c) if the discharge is to land where it may enter groundwater, (i) the discharge cannot cause or exacerbate the flooding of any other property, and (ii) the discharge is not located within 20m of a bore used for water abstraction for potable supply or stock water, and (d) any ~~contaminants stored or used on site, or~~ hazardous substances **stored or used on site,** cannot be entrained in stormwater and discharged to a surface water body or coastal water, including via the stormwater network, or (i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or (ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons, and (e) if the discharge is into a surface water body, coastal water or via an existing local authority stormwater network, the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies),

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					Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and where the discharge is not via an existing local authority stormwater network the discharge shall also not: (f) cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (g) give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life. ~~Note~~ ~~For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to P.R10.~~
S177.058	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Notes rule makes new impervious surfaces at high risk industrial or trade premises a discretionary activity under rule WH.R11. Considers this inappropriate in context of policy 2 and policy 5 of NPSET. Considers it could lead to perverse environmental outcomes, where impervious surfaces are left to degrade as redevelopment of the surface would require a discretionary activity consent. Considers it necessary to provide for new and redeveloped impervious surfaces as permitted or controlled activity under rules WH.R5, WH.R6	Amend rule as follows: Rule P.R5: Stormwater from new and redeveloped impervious surfaces The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an

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				and WH.R7, subject to appropriate conditions. Considers additional conditions under (d) of rule WH.R4 are appropriate to manage potential adverse effects associated with hazardous substances and considers these be incorporated into rule WH.R5. Considers a fixed baseline in condition (a) would be unworkable as it could result in consecutive redevelopment of same impervious surfaces being a controlled or discretionary activity, even where surface is less than 1,000m2. Concerns how compliance with fixed baseline will be monitored with respect to redevelopment (as this cannot be readily measured). Considers a 12-month time period, similar to that used for earthworks, would be more appropriate as it provides greater certainty to applicants, is more readily implementable, and is able to be effectively monitored. Considers Condition (c)(ii) SHould be amended so hydrological control is only required for new impervious surfaces, as redevelopment of existing impervious surfaces will not change quantity of runoff from impervious surfaces. Seeks references to "impervious areas" (undefined) in conditions (c)(i) and (ii) be replaced with "impervious surfaces" (defined) and minor amendments made to condition (c)(ii) to improve the clarity of condition.	existing or new local authority stormwater network, that is not ~~a high risk industrial or trade premise or~~ unplanned greenfield development, is a permitted activity, provided the following conditions are met: (a) the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m2 (~~baseline property existing impervious area as at 30 October 2023)~~ **per property in any consecutive 12-month period** and (b) all new building materials associated with the development shall not include exposed zinc (including galvanised steel) or copper roof, cladding and spouting materials and (c) the proposal provides hydrological control measures (for example rain tanks) onsite or offsite, where discharges will enter a surface water body (including via an existing local authority stormwater network): (i) for all ~~impervious areas~~ **impervious surfaces** associated with a greenfield development, or (ii) for all ~~redeveloped and~~ new ~~impervious areas~~ **impervious surfaces** ~~involving~~ greater than 30m2 ~~of impervious area of a~~ **associated with** redevelopment (of an existing urbanised property), and (d) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (e) the discharge does not contain wastewater, and (f) the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and where the discharge is not via an existing or new local authority stormwater network: (g) the discharge shall not cause any erosion of the channel

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					or banks of the receiving water body or the coastal marine area, and (h) the discharge shall not give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life. **and where the new or redeveloped impervious surface is for a high risk industrial or trade premise:** **(i) any hazardous substances stored or used on site cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or (i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or** **(ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons.** Note Where a property connects to a local authority stormwater network, additional connection requirements and authorisations may be required by the network utility operator.~~For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to Rule P.R10.~~

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S177.059	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Notes the rule makes new impervious surfaces at high risk industrial or trade premises a discretionary activity under rule WH.R11. Considers this inappropriate in the context of policy 2 of NPSET. Considers it necessary to provide for new and redeveloped impervious surfaces as permitted or controlled activity under rules WH.R5, WH.R6 and WH.R7, subject to appropriate conditions. Considers additional conditions under (d) of rule WH.R4 are appropriate to manage potential adverse effects associated with hazardous substances and considers these be incorporated into rule WH.R5. As per submission on policy WH.P15, submitter considers it not consistent with the NPS-FM to require mandatory financial contributions for purposes of aquatic offsetting, as the effects management hierarchy in NPS-FM only requires offsetting in circumstances where residual adverse effects are more than minor. Where residual adverse effects are more than minor, applicants should have opportunity to propose aquatic offsetting or compensation in accordance with Appendix 6 or 7 of NPS-FM. Considers it is inappropriate to require financial contributions as a condition, and instead, matter of control 6 should be amended to refer to policy WH.P15. This ensures appropriate aquatic offsetting or compensation (which may include financial contributions under Schedule 30) can be considered on a case by case basis, where required. Considers a fixed baseline in condition (a) would be unworkable as it could result in consecutive redevelopment of same impervious surfaces being a controlled or discretionary activity, even where surface is less than 1,000m2. Concerns how compliance with fixed baseline will be monitored with respect to redevelopment (as this cannot be	Amend rule as follows: Rule P.R6: Stormwater from new greenfield impervious surfaces The use of land for the creation of new impervious surfaces for greenfield development and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not ~~a high risk industrial or trade premise~~ ~~or~~ unplanned greenfield development, is a controlled activity, provided the following conditions are met: (a) the proposal involves the creation of new impervious surfaces of between 1,000m2 and 3,000m2 ~~(baseline property existing impervious area as at 30 October 2023)~~ **per property in any consecutive 12-month period** **or,** (b) the proposal involves the creation new impervious surfaces of less than 1,000m2, but is not permitted under the conditions of Rule P.R6, and,~~(c) a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions), and~~ (d) where stormwater directly or indirectly (through an existing local authority stormwater network) discharges to a river, hydrological control is provided either: (i) on-site, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has been sized to accommodate the proposed stormwater discharges, and I stormwater contaminant treatment is provided that captures 85% of the mean annual runoff and directs it to a stormwater treatment system that treats in accordance with Schedule 28 (contaminant treatment) and is provided either:

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				readily measured). Considers a 12-month time period, similar to that used for earthworks, would be more appropriate as it provides greater certainty to applicants, is more readily implementable, and is able to be effectively monitored.	(i) on-site, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater treatment system that has capacity to treat contaminant loads from the site., **and where the new impervious surface is for a high risk industrial or trade premise:** **(f) any hazardous substances stored or used on site cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or** **(i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or** **(ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons.** Matters of control 1. The design and layout of the on-site stormwater treatment system, including the ongoing operational and management measures necessary to ensure that stormwater quality will meet the requirements of condition I of this rule 2. The adequacy of hydrological control measures either on-site or off- site, where stormwater will enter a river 3. Where an off-site (or a combination of on-site and off-site) stormwater treatment system is 1424tilized, whether this has capacity, availability (timing) and appropriate authorisations to connect into 4. The long-term operational, maintenance and ownership requirements of the stormwater treatment system 5. Whether sufficient use of water sensitive urban design measures have been applied to the site design and layout 6. ~~A financial contribution as required by Schedule 30 (financial contributions)~~ **Any aquatic offsetting or compensation proposed in accordance with policy P.P14** **7. For high risk industrial or trade premises, the adequacy of any proposed containment system,**

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					interceptor system, or other proposed methods for the management of hazardous substances 8. Condition of consent to demonstrate and/or monitor compliance with conditions (d), ~~and~~ l, **and (f)** of this rule Notification In respect of Rule P.R6, applications are precluded from limited and public notification (unless special circumstances exist). ~~Note~~ ~~For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to Rule P.R10.~~
S177.060	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas-controlled activity.	Amend	Notes rule makes new impervious surfaces at high risk industrial or trade premises a discretionary activity under rule WH.R11. Considers this inappropriate in context of policy 2 and policy 5 of NPSET. Considers it could lead to perverse environmental outcomes, where impervious surfaces are left to degrade as redevelopment of the surface would require a discretionary activity consent. Considers it necessary to provide for new and redeveloped impervious surfaces as permitted or controlled activity under rules WH.R5, WH.R6 and WH.R7, subject to appropriate conditions. Considers additional conditions under (d) of rule WH.R4 are appropriate to manage potential adverse effects associated with hazardous substances and considers these be incorporated into rule WH.R5. Considers a fixed baseline in condition (a) would be unworkable as it could result in consecutive redevelopment of same impervious surfaces being a controlled or discretionary activity, even where surface is less than 1,000m2. Concerns how compliance with fixed baseline will be monitored with respect to redevelopment (as this cannot be	Amend rule as follows: Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas The use of land for the creation of new and/or redevelopment of impervious surfaces of an existing urbanised property and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, ~~that is not a high risk industrial or trade premise,~~ is a controlled activity, provided the following conditions are met: (a) the proposal involves the creation of new, or redevelopment of impervious surfaces of between 1,000m2 and 3,000m2 ~~(baseline property existing impervious area as at 30 October 2023)~~ **per property in any consecutive 12-month period** or, (b) the proposal involves the creation of new, or redevelopment of impervious areas of less than 1,000m2 but is not permitted under the conditions of Rule P.R6, and, (c) where stormwater directly or indirectly (through an existing local authority stormwater network) discharges to a

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				readily measured). Considers a 12-month time period, similar to that used for earthworks, would be more appropriate as it provides greater certainty to applicants, is more readily implementable, and is able to be effectively monitored.	river, hydrological control is provided either: (i) on-site, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has been sized to accommodate the proposed stormwater discharges, and (d) contaminant treatment of stormwater is provided either: (i) on-site through a stormwater treatment system, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater treatment system that has capacity to treat contaminant loads from the site **and where the new or redeveloped impervious surface is for a high risk industrial or trade premise:** **(e) any hazardous substances stored or used on site cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or** **(i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or** **(ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons.** Matters of control 1. Whether the design and layout of the on-site stormwater treatment system incorporates best practicable option measures to achieve (to the extent practicable) the capture of 85% of the mean annual stormwater runoff and treatment in accordance with Schedule 28 (contaminant treatment) 2. Whether the design and layout undertakes a best practicable option approach to the provision of hydrological control measures either on- site or off-site, where stormwater will enter a river 3. Where an off-site (or a combination of on-site and off-site) stormwater treatment system is utilised, whether this has capacity, availability (timing) and appropriate authorisations to connect into

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					4. The long-term operational, maintenance and ownership requirements of the stormwater treatment system 5. Whether there are topographical limitations influencing the provision of stormwater hydrological control and contaminant treatment 6. Whether sufficient use of water sensitive urban design methods have been applied to the site design and layout 7. **For high risk industrial or trade premises, the adequacy of any proposed containment system, interceptor system, or other proposed methods for the management of hazardous substances** 8. Conditions to monitor compliance associated with any stormwater treatment system, ~~or~~ hydrological control measures, **or measures required under condition (e).** Notification In respect of Rule P.R~~(NEWRULE)~~ **7**, applications are precluded from limited and public notification (unless special circumstances exist). ~~Note~~ ~~For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to refer to Rule P.R8.~~
S177.061	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Amend	Opposes default discretionary activity status for new or redeveloped impervious surfaces at high risk industrial or trade premises (including National Grid substations), for reasons set out in its submissions of rules P.R5, P.R6 and P.R7 (submission points 62-64). Considers a reasonable level of new or redeveloped impervious surfaces should be provided for as a permitted or controlled activity under rules P.R5, P.R6 and P.R7, subject to appropriate conditions to manage the potential adverse effects associated with hazardous substances. As per submission on policy P.P14, it is not consistent with NPS-FM to require mandatory	Amend rule as follows: Rule P.R10: Stormwater from new and redeveloped impervious surfaces The use of land for the creation of new or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including via an existing local authority stormwater network, that is not permitted by Rule P.R5, or a controlled activity under Rule P.R6 or Rule P.R7, or prohibited under P.R12 is a discretionary activity provided the following condition~~s~~ ~~are~~ **is** met:

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				financial contributions for purposes of aquatic offsetting, as the effects management hierarchy in NPS-FM only requires offsetting in circumstances where residual adverse effects are more than minor. Where residual adverse effects are more than minor, applicants should have opportunity to propose aquatic offsetting or compensation in accordance with Appendix 6 or 7 of the NPS-FM. Considers it inappropriate to require financial contributions as a condition. Where aquatic offsetting or compensation (which may include financial contributions under Schedule 30) is considered to be necessary, this can be provided for as a condition of consent with reference to requirements of policy P.P14.	(a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), **and.** ~~(b) if the proposal is for greenfield development, a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions).~~
S177.062	9 Te Awarua-o-Porirua Whaitua	Rule P.R11: All other stormwater discharges - non-complying activity.	Amend	Considers that the move to non-complying activity status for all other stormwater discharges is not clearly explained or justified in section 32 report. Concerned with the jump between permitted activity status for stormwater discharges under rules P.R2, P.R3, and P.R4, and non-complying activity status under this rule. Minor non-compliances with conditions under these rules will trigger the non-complying activity rule. Non-complying activity status for minor breaches of rule conditions can be a particular issue for development or upgrading of the National Grid, which due to the linear nature of the Grid can involve complex, bundled consents for a broad range of activities, some of which may have adverse effects that are more than minor (for example, visual effects). This leads to a high degree of uncertainty as to whether consents for development or upgrading of the National Grid will be granted under section 104D of RMA, even where minor non-compliances with stormwater conditions under rules	Amend rule as follows: Rule P.R11: All other stormwater discharges - ~~non-complying~~ **discretionary** activity The: (a) discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule P.R2, or (b) discharge of stormwater into water or onto or into land where it may enter water, that is not permitted by Rule P.R3, or a restricted discretionary activity under Rule P.R8, or (c) discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule P.R4, ~~or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade premise that does not meet the conditions of Rule P.R10, or~~ ~~(d) use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater water or onto or into land where it may enter water, that is not permitted by Rule P.R5, or a controlled~~

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				P.R2, P.R3, or P.R4 can be appropriately addressed through consent conditions. Regarding the National Grid, this does not appropriately give effect to policy 2 of NPSET, as it does not provide for effective upgrading and development of electricity transmission networks. Considers non-complying activity rule is not sufficiently justified in section 32 report and does not appropriately provide for activities that do not meet permitted activity conditions, but which can otherwise be managed through consent conditions as a discretionary activity. Non-complying activity status should be reserved for activities that are clearly contrary to the objectives and policies of the Plan (as they relate to stormwater discharges), rather than all discharges that do not meet permitted activity standards. Submitter does consider that non-complying activity status should be retained for proposals that do not provide a Stormwater Impact Assessment under rule P.R10, as this would clearly be contrary to objectives and policies of the Plan.	~~activity under Rules P.R6 or P.R7, or a discretionary activity under Rule P.R9, or a prohibited activity under Rule P.R12,~~ is a ~~non-complying~~ **discretionary** activity. As a consequential amendment, provide a new non-complying activity rule for stormwater discharges that are not a discretionary activity under rule P.R10.
S177.063	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Oppose	Considers the definition of unplanned greenfield development is too broad and uncertain. Unclear if all development is prohibited or just specific kinds of urban development. Concerns the approach could prohibit works on regionally significant infrastructure (including the National Grid) in areas identified as "unplanned greenfield development areas". Concerned that the policies and rules of "unplanned greenfield development areas" may capture works on the national grid which would be contrary to Policy 14 and the objective of the NPSET. Questions the efficiency and practicability of the proposed approach which creates jurisdictional overlap between territorial authorities, the regional council, and the Minister of Conservation)on the	Delete rule.

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				management of development in "unplanned greenfield development areas". Noting decisions on separate plan changes must be made separately and considers this will be highly inefficient for applicants and submitters and applicants and risks inconsistency. Considers the appropriate means of providing for a combined regulatory approach is through a combined planning document to address the issue, as per section 80 of the RMA. Considers the appropriate means of providing for a combined regulatory approach is through a combined planning document to address the issue, as per section 80 of the RMA. If the relief sought by submitter on definition of "unplanned greenfield development" is granted in full, submitter would consider adopting a neutral position on rule.	
S177.064	9 Te Awarua-o-Porirua Whaitua	Rule P.R16: Vegetation clearance on highest erosion risk land-permitted activity.	Oppose	Notwithstanding concerns raised in this submission regarding the mapping of 'highest erosion risk land (woody vegetation)', submitter seeks amendment to R17. Acknowledging operative definition of Vegetation Clearance applies to rule, considers several amendments are necessary to the rule. Regular vegetation clearance to prevent vegetation from encroaching on National Grid transmission lines and structures (beyond that provided in Electricity (Hazards from Trees) Regulations 2003) is a necessary part of maintaining safe and efficient operations of electricity transmission network. Providing for vegetation clearance underneath or near National Grid transmission lines or structures as a permitted activity is necessary in order to give effect to policy 5 of NPSET, which requires that the reasonable operational and maintenance requirements of the National Grid are provided for, and policy 10 of NPSET, which requires operation	Amend rule as follows: Rule P.R16: Vegetation clearance on highest erosion risk land Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a surface water body is a permitted activity provided the following conditions are met: (a) the vegetation clearance is: (i) **for no more than a total area of 200m2 per property in any consecutive 12-month period, or** (ii) to implement an action in the erosion risk treatment plan for the farm, or (iii) for the control of pest plants, ~~and~~ **or** **(iv) for the purposes of operating or maintaining the National Grid, and** (b) debris from the vegetation clearance is not placed where it can enter a surface water body. In addition to this, reallocate the rule so that it is part of the

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				and maintenance of electricity transmission network is not compromised. Seeks to add a subclause to clause (a) to clarify that vegetation clearance of less than 200m2 per property per year is permitted activity (on the basis that clearance of more than 200m2 is a controlled activity under rule P.R17). Considers it necessary to avoid clearance of less than 200m2 becoming an innominate activity (and therefore discretionary). Clarification is sought as to how the 200m2 is calculated - is it the identified woody vegetation or on a site which contains an area of woody vegetation. Opposes rule being included within freshwater planning instrument, as the purpose of rule is to manage land use for purposes of soil conservation and seeks that it be reallocated to Part 1 Schedule 1 planning instrument.	Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.
S177.065	9 Te Awarua-o-Porirua Whaitua	Rule P.R17: Vegetation clearance on highest erosion risk land - controlled activity.	Amend	Subject to Transpower's relief being granted on rule P.R6 (providing for vegetation clearance for the purposes of operating or maintaining the National Grid as a permitted activity) submitter is neutral on rule, noting NESETA regulation 32 would apply (and prevail) where works are not permitted. Considers the rehabilitation of areas of cleared vegetation (under matter of control 3) should not be undertaken in a manner or in locations where vegetation would encroach on National Grid lines or structures. Considers that an additional matter of control is necessary to address this matter. Opposes rule being included within freshwater planning instrument, as purpose of rule is to manage land use for purposes of soil conservation	Amend rule as follows: Rule P.R17: Vegetation clearance on highest erosion risk land Vegetation clearance on highest erosion risk land (woody vegetation), of more than a total area of 200 m2 per property in any consecutive 12-month period, and any associated discharge of sediment to a surface water body, is a controlled activity provided an erosion and sediment management plan has been prepared in accordance with Schedule 33 (vegetation clearance plan) and submitted with the application for resource consent under this rule. Matters of control 1. The content of the erosion and sediment management plan, including the actions, management practices and

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				and seeks that it be reallocated to Part 1 Schedule 1 planning instrument.	mitigation measures necessary to ensure that discharge of sediment will not exceed that which occurred from the land prior to the vegetation clearance occurring 2. The area, location and method of vegetation clearance 3. Stabilisation and rehabilitation of the area cleared 4. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent (including auditing of information) to demonstrate and/or monitor compliance with the resource consent and the erosion and sediment management plan 5. The timing, frequency and requirements for review, audit and amendment of the erosion and sediment management plan 6. The time and circumstances under which the resource consent conditions may be reviewed **7. The need for any rehabilitated areas of vegetation to be clear of National Grid transmission lines and support structures** In addition to this, reallocate the rule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.
S177.066	9 Te Awarua-o-Porirua Whaitua	Rule P.R18: Vegetation clearance - discretionary activity.	Oppose	Subject to Transpower's relief being granted on rule WH.R17 submitter is neutral on rule, noting NESETA regulation 32 would apply (and prevail) where works are not permitted. Opposes rule being included within freshwater planning instrument, as purpose of rule is to manage land use for purposes of soil conservation and seeks that it be reallocated to Part 1 Schedule 1 planning instrument.	Reallocate the rule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.
S177.067	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Amend	Notes effect of use of "and" at the end of condition (b) is to exclude all earthworks not related to implementing farm erosion risk treatment plans or farm environmental plans from the permitted activity rule. As a result, all other earthworks, regardless of size or whether they meet conditions (c) to (h) will	Amend rule as follows: Rule P.R22: Earthworks Earthworks is a permitted activity, provided the following conditions are met:

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				be a restricted discretionary activity under rule P.R23. Considers this is an error and acknowledges Council have corrected this under clause 16 of Schedule 1 to the RMA by way of a memo published on 6 December 2023. Submitter has submitted on the rule as notified. Notes Council's proposed approach is to remove associated discharges from earthworks rule, and instead, discharges associated with earthworks are permitted under separate "minor discharges" rule (R91). Given that rule P.R22 is not a discharge rule, submitter considers it should not include condition (g), which is a discharge condition. Considers condition (g) inappropriate as it is not consistent with the minor discharges rule, which permits a minor discharge of suspended solids to surface water bodies or coastal water. Considers that given minor discharges rule provides for discharge of suspended solids, condition (h) be amended to reflect purpose of erosion and sediment control is to prevent uncontrolled discharge of sediment, rather than all discharge of sediment. Opposes rule being included within freshwater planning instrument, as purpose of rule is to manage land use for purposes of soil conservation. As rule does not provide for discharges associated with earthworks, there is no justification for including it in freshwater planning instrument, seeks that it be reallocated to Part 1 Schedule 1 planning instrument.	(a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, ~~and~~ **or** (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and ~~(g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and~~ (h) erosion and sediment control measures shall be used to prevent ~~a~~ **the uncontrolled** discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021). In addition to this, reallocate the rule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.
S177.068	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted	Amend	Considers chapeau of rule be restructured to locate "associated discharge" element of rule to follow on from "Earthworks that do not comply with Rule P.R22" as discharges associated with permitted earthworks are not provided for under rule P.R22	Rule P.R23: Earthworks Earthworks ~~and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network,~~ that do~~es~~

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		discretionary activity.		(which only permits earthworks). Discharges from permitted earthworks are instead provided for under the "minor discharges" rule R91. Considers a condition requiring earthworks be shut down over the winter months is inappropriate, as it does not recognise circumstances where earthworks need to occur over those months in order to provide for safe and efficient operation, maintenance, upgrading, or development of regionally significant infrastructure (including the National Grid). Recognises earthworks should be planned so majority of bulk earthworks occur outside of winter months. Considers instances where earthworks are unavoidable and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Notes GWRC Erosion and Sediment Control Guideline for Wellington Region (2021), which is referred to in policy P.P29 (and in the note to permitted activity rule P.R22), provides a pathway for earthworks to be undertaken during winter months subject to careful management. Considers rather than a blanket restriction on all earthworks over this period, reference is made to matters set out under section G5.0 of guideline as a matter of discretion for earthworks. Considers that the note directing Plan users to GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021)that is included under permitted activity rule P.R22 also be provided for under this rule.	not comply with Rule P.R22, **and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network,** is a ~~restricted~~ discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, ~~and~~ ~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~ Matters for discretion 1. The location, area, scale, volume, duration and staging and timing of works 2. The design and suitability of erosion of sediment control measures including consideration of hazard mitigation and the risk of accelerated soil erosion associated the staging of works and progressive stabilisation 3. The placement and treatment of stockpiled materials on the site, including requirements to remove material if it is not to be reused on the site 4. The proportion of unstabilised land in the catchment 5. The adequacy and efficiency of stabilisation devices for sediment control 6. Any adverse effects on: (i) groundwater, surface water bodies and their margins, particularly surface water bodies within sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule

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					F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori customary use) or Schedule I (important trout fishery rivers and spawning waters) (ii) group drinking water supplies and community drinking water supplies (iii) mauri, water quality (including water quality in the coastal marine area), aquatic and marine ecosystem health, aquatic and riparian habitat quality, indigenous biodiversity values, mahinga kai and critical life cycle periods for indigenous aquatic species (iv) the natural character of lakes, rivers, natural wetlands and their margins and the coastal environment (v) natural hazards, land stability, soil erosion, sedimentation and flood hazard management including the use of natural buffers 7. Duration of the consent 8. ~~Preparation required for the close down period (from 1st June to 30th September each year) and any maintenance activities required during this period~~ **Where earthworks will be undertaken within the period from 1 June to 30 September, the matters set out under section G5.0 of the Greater Wellington Regional Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021)** 9. Monitoring and reporting requirements **Note** **Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).**
S177.069	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks - non-complying activity.	Amend	Considers that the move to non-complying activity status for all other earthworks is not clearly explained or justified in the section 32 evaluation report. Non-compliance with conditions under rule P.R24 will trigger the non-complying activity rule.	Amend rule as follows: Rule P.R24: Earthworks - ~~non-complying~~ **discretionary** activity Earthworks, and the associated discharge of sediment into a

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				Non-complying activity status for minor breaches of rule conditions can be a particular issue for development or upgrading of the National Grid, which due to the linear nature of the Grid can involve complex, bundled consents for a broad range of activities, some of which may have adverse effects that are more than minor (for example, visual effects). This leads to a high degree of uncertainty as to whether consents for development or upgrading of the National Grid will be granted under section 104D of RMA, even where adverse effects of the part of the proposal that triggered non-complying activity status can be appropriately addressed through consent conditions. This does not appropriately give effect to policy 2 of NPSET, as it does not provide for the effective upgrading and development of the electricity transmission network. Considers the non-complying activity rule is not sufficiently justified in section 32 report and does not appropriately provide for activities that do not meet restricted discretionary activity conditions, but which can otherwise be managed through consent conditions as a discretionary activity.	surface water body or coastal water or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule P.R23 is a ~~non-complying~~ **discretionary** activity.
S177.070	12 Schedules	Schedule 28: Stormwater Contaminant Treatment.	Amend	Considers an amendment to first sentence under heading "Target Load Reductions" is necessary to clarify that rules require stormwater discharges from impervious surfaces to be treated (as distinct from the surfaces themselves being treated).	Amend schedule as follows: Schedule 28: Stormwater Contaminant Treatment This schedule relates to Rules WH.R6, WH.R7, P.R6 and P.R7 Target Load Reductions ~~All~~ **Stormwater discharges from** new and redeveloped impervious surfaces are to be treated to meet an equivalent target load reduction for copper and zinc to those set out for a raingarden/bioretention device, as per Table 1. Table 1: Target Load Reductions for Copper and Zinc

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					Treatment Device Copper Zinc Bioretention (rain garden) 90% 90% Equivalent Target Load Reduction A treatment train approach may be used to achieve an Equivalent Target Load Reduction set out in Table 1. The equation below provides an example of how the total load reduction factor of a given treatment chain can be calculated: R = A + B - [(A × B)/100] Where: R = Total load reduction factor A = Load reduction factor or the first or upstream treatment device B = Load reduction factor or the second or downstream treatment device Additional Device Load Reductions be used to determine whether an Equivalent Target Load Reduction (i.e inputs for A and B) is achieved to that of the Target Load Reduction specified in Table 1. Table 2: Additional Devices and Specified Load Reductions for Copper and Zinc Treatment Device Copper Zinc Constructed Wetland 80% 80% Swales 50% 65% Where alternative treatment devices to that of a bioretention/raingarden device are utilised, the specified load reduction factors set out in Table 2 must be used to determine whether an Equivalent Target Load Reduction (i.e inputs for A and B) is achieved to that of the Target Load Reduction specified in Table 1. [...]
S177.071	12 Schedules	Schedule 29: Stormwate	Amend	Seeks amendment to bullet point 3 to remove reference to redeveloped impervious surfaces. No benefit in calculating volume and flow rate of	Amend schedule as follows: Schedule 29: Stormwater Impact Assessments

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		r Impact Assessments.		discharges from redeveloped impervious surfaces, as there will be no change to discharge volume and flow rate (when compared to existing). Seeks amendment to bullet point 5 to remove references to wording that is extraneous and difficult to interpret. Wording sought to be deleted is generally covered by definition of "water sensitive urban design". Seeks amendment to bullet point 2 under list of matters specific to high risk industrial and trade premises to replace term "contaminants" with "hazardous substances", on as the purpose of the rules is to manage potential entrainment of hazardous substances within stormwater (rather than contaminants generally). Considering cultural considerations under bullet point 8, supports engagement with mana whenua, but seeks clarity about what is anticipated and required by the Council. Supports engagement with mana whenua, but is mindful of the burden this can place on the resources of mana whenua and applicants particularly when engagement is not appropriately targeted or responsive to scale and significance of proposal. While submitter generally supports bullet point 8, also supports improved clarity on Council's expectations with respect to these matters.	A stormwater impact assessment shall include the following analysis: 1. Site evaluation: the site must be assessed for its topography, soil type, land use, drainage patterns (including wetlands/water courses), natural features, topographical and geotechnical constraints and potential flood areas. 2. Catchment evaluation: analyse catchment wide characteristics and requirements (utilising existing local authority stormwater management strategies where available) to consider the proposed development in a broader stormwater discharge and receiving environment context to understand relevant catchment issues, including flooding, climate change projections (frequency and volume), water quality and any additional design or mitigation measures required to address wider catchment matters. 3. Stormwater discharge calculation: calculation of stormwater discharge volumes and flow rates along with analysis of stormwater contaminant generation from and new ~~and/or redeveloped~~ impervious surfaces. 4. Identification of actual and potential stormwater impacts: undertake evaluation of the actual and potential impacts on the receiving environment, including water quality, natural flow regimes of waterways, soil erosion, flooding, changes in hydrology and climate change (frequency and volume). 5. Implementation of Water Sensitive Urban Design principles: provide an analysis of how Water Sensitive Urban Design measures have been identified and incorporated into the site design and layout, building and road/paving materials and ~~features and how existing natural features and~~ new stormwater treatment systems ~~have been enhanced and integrated to mimic natural processes.~~ 6. Mitigation measures: Assessment of proposed mitigations to reduce the effect of stormwater discharges on water quantity and quality, including the approach to treat in accordance with Schedule 28 (contaminant treatment) and implement hydrological control. Measures must support achieving relevant target attribute states (beyond zinc and

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					copper) for ecosystem health, including nutrients, visual clarity and E. coli or enterococci. 7. Operation and maintenance of stormwater management systems: analyse the long-term (life-cycle) operational and maintenance requirements including funding mechanisms and identification of persons responsible for ongoing maintenance. 8. Cultural considerations: to be informed by engagement with mana whenua. Where the application includes a high risk industrial or trade premise the stormwater impact assessment analysis must also consider the following: 1. Procedures and equipment in place to contain any spillage of hazardous substances for storage or removal, to ensure these are not entrained in stormwater, and 2. Management practices proposed to avoid or minimise entrainment of ~~contaminants~~ **hazardous substances** into stormwater, including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring.
S177.072	12 Schedules	A Context	Amend	References to offsetting should be accompanied by references to compensation as there is insufficient certainty about whether the financial contribution will be used (as set out in section E) to address residual stormwater contaminants from new impervious surfaces discharged within catchment (which is offsetting), or whether it will be used to improve water quality across a range of values, not limited to impervious surface contaminants, in whaitua generally (which is compensation). As per submissions on policies WH.P15 and P.P14, considers applicants should be given a reasonable opportunity to undertake their own aquatic offsetting or compensation to address more than minor	Amend schedule as follows: A Context Under section 108(2)(a) and (10) of the Resource Management Act 1991, a consent authority may impose a condition on a resource consent requiring a financial contribution to be made for the purpose of offsetting, **or compensating for,** ~~an~~ environmental adverse effect. The creation of impervious surfaces through new greenfield development, new roads (not directly associated with a greenfield development) and state highways will result in an increase of stormwater contaminants entering freshwater receiving environments. Stormwater contaminant treatment

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				residual adverse effects, in line with effects management hierarchy provided for under NPS-FM. Considers that "is required" be replaced with "may be required" in final paragraph of section. As per submissions on policies WH.P15 and P.P14, considers that amendment to final paragraph is necessary to reflect that NPS-FM only requires offsetting or compensation in circumstances where residual adverse effects are more than minor.	will be required of new development proposals, however, treatment of contaminants is only practicable for a portion of the contaminant load received from the site. This results in a residual contaminant load still entering freshwater and coastal water receiving environments. The National Policy Statement for Freshwater Management 2020 requires freshwater quality to be maintained or improved. A financial contribution ~~is~~ **may be** required to offset **or compensate for** the adverse environmental effects **(where they are more than minor)** of the residual stormwater contaminants entering freshwater receiving environments where policy WH.P15 and P.P13 anticipates a deterioration of water quality could arise.
S177.073	12 Schedules	B Purpose	Amend	As per submissions on policies WH.P15 and P.P14, considers applicants should be given a reasonable opportunity to undertake their own aquatic offsetting or compensation to address more than minor residual adverse effects, in line with effects management hierarchy provided for under NPS-FM. Considers that "is required" be replaced with "may be required" in final paragraph of section. Considers amendments necessary to clarify the financial contribution is not for greenfield development generally, but new impervious surfaces created as part of greenfield development. Seeks references to offsetting be accompanied by references to compensation as there is insufficient certainty about whether the financial contribution will be used (as set out in section E) to address residual stormwater contaminants from new impervious surfaces discharged within catchment (which is offsetting), or whether it will be used to improve water quality across a range of values, not limited to impervious surface contaminants, in whaitua generally (which is compensation).	Amend schedule as follows: B Purpose A financial contribution ~~is~~ **may be** required for ~~all~~ **the creation of new impervious surfaces as part of new** greenfield development, new roads and state highways requiring a resource consent to offset **or compensate for more than minor** residual contaminant load from stormwater discharges entering freshwater and coastal water receiving environments to ensure the maintenance or improvement of water quality within the affected whaitua. Financial contributions collected will be utilised to fund and construct new, or upgrade existing, catchment scale stormwater treatment systems serving existing urban development, within the same whaitua and if practicable, the same part Freshwater Management Unit.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				As per submissions on policies WH.P15 and P.P14, considers amendment to paragraph is necessary to reflect that NPS-FM only requires offsetting or compensation in circumstances where residual adverse effects are more than minor.	
S177.074	12 Schedules	C Definition of an Equivalent Household Unit	Amend	Considers consistent terminology should be used across policies, rules and Schedule 30 when referring to impervious surfaces. As such the terms "roofing or roading/hardstand area" should be replaced with "new impervious surfaces". The term "new" is important, as financial contributions should be calculated on the basis of new surfaces, not redeveloped ones. Considers the term "dramatically" unnecessary and should be removed.	Amend schedule as follows: C Definition of an Equivalent Household Unit An Equivalent Household Unit (EHU) is the basis for assessing the residual environmental impact (measured for copper and zinc contaminants in this instance) of the development of an average-sized residential unit for the purposes of calculating a financial contribution. Each average-sized new residential unit is deemed to create one unit of impact (one EHU). Because non-residential developments and new roads/state highways (not in direct support of a greenfield development) also impact contaminant levels, but can vary ~~dramatically~~ in size, every 100m2 of ~~roofing or roading/hardstand area~~ **new impervious surface** is deemed to create one unit of impact, rather than using the EHU unit of measure used for residential development. Financial contributions are calculated based on the number of EHUs expected to be delivered in greenfield areas in the two whaitua. Non-residential and new road/state highway financial contributions are calculated based on the amount of ~~roofing and roading/hardstand~~ **new impervious surface** expected.
S177.075	12 Schedules	D Calculation of level of contribution	Amend	Considers section D of schedule be amended to clarify the financial contribution is based on area of new impervious surface, not total area of development.	Amend schedule as follows: D Calculation of level of contribution Financial contributions shall be calculated per EHU for residential greenfield development (Table D1), or per 100m2

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					of new impervious surface area for non-residential greenfield development and new roads/state highways (not in direct support of a greenfield development) (Table D2). Table D1. Financial contribution calculations for residential greenfield development Whaitua Residential Financial Contribution per EHU* Whaitua Te Whanganui-a-Tara $4, 240 Te Awarua-o-Porirua Whaitua $4, 599 *dwellings with <55m2 of roof site coverage shall be charged at 0.6 of the financial contribution rate Table D2. Financial contribution calculations for non-residential greenfield development and new roads/state highways Whaitua Non-residential (i.e new commercial, industrial, town centre areas) Financial Contributions per 100m2 **of new impervious surface** New roads and state highways (not in direct support of a new greenfield development) Financial Contribution per 100m2 **of new impervious surface** Whaitua Te Whanganui-a-Tara $858 $360 Te Awarua-o-Porirua Whaitua $858 $360 Financial contributions shall be imposed as a condition of consent and will be collected prior to the consent being given effect to.

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S177.076	12 Schedules	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Oppose	Opposes schedule being included within freshwater planning instrument, as purpose of the schedule is to manage land use for the purposes of soil conservation. Seeks schedule be reallocated to the Part 1 Schedule 1 planning instrument.	Reallocate the schedule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.
S177.077	12 Schedules	B Management objectives	Amend	Providing for revegetation of land below or near National Grid transmission lines or structures could compromise safe operation of National Grid, and considers this should be acknowledged in objective (d) in order to give effect to Policy 10 of NPSET.	Amend schedule as follows: B Management objectives The Erosion and Sediment Management Plan must demonstrate that the measures adopted to address the identified risks will: (a) minimise sediment loss from the vegetation clearance by adopting, as a minimum, good management practice, and (b) avoid an increase in risk of loss of sediment to water relative to the risk of loss that exists from the land in a natural state, and (c) minimise the discharge of water and sediment resulting from the vegetation clearance into a surface water body, and (d) provide for the land to be restored and revegetated with appropriate species **(except below or near National Grid transmission lines and structures, where revegetation is not appropriate).**
S177.078	12 Schedules	C Requirements of the Erosion and Sediment Management Plan	Amend	As per submission on management objectives, considers clause (c)(v) of section C1 be amended to recognise it is inappropriate to undertake revegetation on land located underneath or near National Grid transmission lines or support structures. Considers terms "critical source areas" and "hotspots for sediment loss to surface water" under clause (b)(ix) are unclear, and should be defined so	Amend schedule as follows: C Requirements of the Erosion and Sediment Management Plan C1 Contents of the Erosion and Sediment Management Plan The Erosion and Sediment Management Plan shall contain as a minimum: (a) The following details that describe the land where the

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				that it is clear to plan users what these terms mean, and what is sought to be mapped under this clause.	vegetation clearance is proposed: (i) The full name, postal and physical address and contact details (including email addresses and telephone numbers) of the person responsible for vegetation clearance on the land, including the name of and contact details for the managers or contractors, and (ii) The property location identifier, the cadastral and map references and GIS polygon reference, and (iii) The legal description and ownership of each parcel of land if different from the person responsible for vegetation clearance on the land, and (iv) The full name, postal and physical address and contact details (including email addresses and telephone numbers), qualifications and relevant experience of the person responsible for preparing the Erosion and Sediment Management Plan. Maps (b) The Erosion and Sediment Management Plan must include maps at a scale not less than 1:10000 that include and show: (i) the computer freehold register, the date, and a north arrow, and (ii) the vegetation clearance and operational area boundaries, and (iii) the public road(s) used for access, entry points to the land and rural number(s) of entry point(s), and (iv) the external property boundaries within 200 m of the vegetation clearance areas, and (v) the catchment and sub-catchment that the vegetation clearance area is within and a map showing the location of the vegetation clearance area within the catchment and sub-catchment, and (vi) the location (and for named waterbodies, the names) of waterbodies on the property, including permanently or intermittently flowing including rivers, streams, drains; wetlands, lakes and springs, and specifically identifying any waterbodies where vegetation clearance activities are subject to Resource Management (National Environmental Standards for Freshwater) Regulations 2020 or rules in the Plan, and

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					(vii) the location of any site or river included in Schedules B, C, F1 and F3 of this Plan that is within, or adjacent to, the vegetation clearance area, and (viii) a 1m digital elevation model overlay of the terrain of the vegetation clearance area, and (ix) the location of land with highest erosion risk land (woody vegetation), any other critical source areas, and hotspots for sediment loss to surface water, and (x) location of the proposed vegetation clearance operations including earthworks, land preparation, roads and formed tracks and access ways, water body entry or crossing, harvesting methods, skid and landing sites. Operating systems and practices (c) A description of the planned vegetation clearance operations and management practices. This shall be in sufficient detail to reflect the scale of any environmental risk and the measures in place, or to be undertaken, that will mitigate the risk of sediment loss from the land as a result of vegetation clearance activity. At a minimum, this shall include a description of management practices to be used, including specific practices identified in relevant guidelines for: (i) Planning and design for construction, maintenance and rehabilitation of roads, tracks, skid sites and landings; clearing and stripping of land; bulk earthworks; and fill placement and compaction, and (ii) Erosion and sediment control measures, including structures and vegetation to manage erosion and minimise sediment loss, and (iii) Vegetation clearance techniques and practices with particular regard for highest erosion risk land (woody vegetation), and (iv) Managing debris and slash, and (v) Rehabilitation and revegetation of highest erosion risk land (woody vegetation), **except where the land is located underneath or near National Grid transmission lines or structures,** and (vi) Recording and monitoring of management practices and performance of mitigation measures, and

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					(vii) Monitoring of effects of activities on land stability and water quality, (viii) Other practices necessary to assess and mitigate the risk of sediment loss. (d) The Erosion and Sediment Management Plan shall set out the time period over which the good management practices and mitigation measures will be implemented and the methods by which their implementation will be recorded and performance and effects monitored.
S177.079	13 Maps	Map 77: Habitats of nationally threatened freshwater species - Te Awarua-o-Porirua and Te Whanganui-a-Tara (Schedule F1).	Amend	Considers GIS mapping of riverine habitats described in Map 77 and Schedule F1 does not appear to accurately align with actual river extents. Refers to GIS mapping of riverine habitat adjacent to Pauatahanui Substation. Plan users will rely on the mapping of scheduled riverine habitats to interpret spatial application of Schedule F1. To ensure certainty with respect to application of the rules that relate to scheduled riverine habitats, habitats to which rules apply to should be accurately mapped.	Amend GIS mapping of riverine environments described in Map 77 to accurately reflect the habitat extents covered by Schedule F1.
S177.080	13 Maps	Map 86: Unplanned greenfield areas - Porirua City Council.	Oppose	Considers the definition of unplanned greenfield development is too broad and uncertain. Unclear if all development is prohibited or just specific kinds of urban development. Concerns the approach could prohibit works on regionally significant infrastructure (including the National Grid) in areas identified as "unplanned greenfield development areas". Concerned that the policies and rules of "unplanned greenfield development areas" may capture works on the national grid which would be contrary to Policy 14 and the objective of the NPSET. Questions the efficiency and practicability of the proposed approach which creates jurisdictional overlap between territorial authorities, the regional council, and the Minister of Conservation)on the	Delete map.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				management of development in "unplanned greenfield development areas". Noting decisions on separate plan changes must be made separately and considers this will be highly inefficient for applicants and submitters and applicants and risks inconsistency. Considers the appropriate means of providing for a combined regulatory approach is through a combined planning document to address the issue, as per section 80 of the RMA. Notes if it is Council's position this issue requires a combined approach with territorial authorities, then the appropriate means of providing for this is through a combined planning document (and the Council is obliged to consider this under section 80(7) of the RMA). Submitter notes its principal concern with this approach is it is unclear whether it would prohibit the upgrading or development of its assets. If the relief sought by submitter on definition of "unplanned greenfield development" is granted in full, submitter would consider adopting a neutral position on this map.	
S177.081	13 Maps	Map 87: Unplanned greenfield areas - Wellington City Council.	Oppose	Considers the definition of unplanned greenfield development is too broad and uncertain. Unclear if all development is prohibited or just specific kinds of urban development. Concerns the approach could prohibit works on regionally significant infrastructure (including the National Grid) in areas identified as "unplanned greenfield development areas". Concerned that the policies and rules of "unplanned greenfield development areas" may capture works on the national grid which would be contrary to Policy 14 and the objective of the NPSET. Questions the efficiency and practicability of the proposed approach which creates jurisdictional overlap between territorial authorities, the regional council, and the Minister of Conservation)on the	Delete map.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				management of development in "unplanned greenfield development areas". Noting decisions on separate plan changes must be made separately and considers this will be highly inefficient for applicants and submitters and applicants and risks inconsistency. Considers the appropriate means of providing for a combined regulatory approach is through a combined planning document to address the issue, as per section 80 of the RMA. Notes if it is Council's position this issue requires a combined approach with territorial authorities, then the appropriate means of providing for this is through a combined planning document (and the Council is obliged to consider this under section 80(7) of the RMA). Submitter notes its principal concern with this approach is it is unclear whether it would prohibit the upgrading or development of its assets. If the relief sought by submitter on definition of "unplanned greenfield development" is granted in full, submitter would consider adopting a neutral position on this map.	
S177.082	13 Maps	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Oppose	Considers the definition of unplanned greenfield development is too broad and uncertain. Unclear if all development is prohibited or just specific kinds of urban development. Concerns the approach could prohibit works on regionally significant infrastructure (including the National Grid) in areas identified as "unplanned greenfield development areas". Concerned that the policies and rules of "unplanned greenfield development areas" may capture works on the national grid which would be contrary to Policy 14 and the objective of the NPSET. Questions the efficiency and practicability of the proposed approach which creates jurisdictional overlap between territorial authorities, the regional council, and the Minister of Conservation)on the	Delete map.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				management of development in "unplanned greenfield development areas". Noting decisions on separate plan changes must be made separately and considers this will be highly inefficient for applicants and submitters and applicants and risks inconsistency. Considers the appropriate means of providing for a combined regulatory approach is through a combined planning document to address the issue, as per section 80 of the RMA. Notes if it is Council's position this issue requires a combined approach with territorial authorities, then the appropriate means of providing for this is through a combined planning document (and the Council is obliged to consider this under section 80(7) of the RMA). Submitter notes its principal concern with this approach is it is unclear whether it would prohibit the upgrading or development of its assets. If the relief sought by submitter on definition of "unplanned greenfield development" is granted in full, submitter would consider adopting a neutral position on this map.	
S177.083	13 Maps	Map 89: Unplanned greenfield areas - Hutt City Council.	Oppose	Considers the definition of unplanned greenfield development is too broad and uncertain. Unclear if all development is prohibited or just specific kinds of urban development. Concerns the approach could prohibit works on regionally significant infrastructure (including the National Grid) in areas identified as "unplanned greenfield development areas". Concerned that the policies and rules of "unplanned greenfield development areas" may capture works on the national grid which would be contrary to Policy 14 and the objective of the NPSET. Questions the efficiency and practicability of the proposed approach which creates jurisdictional overlap between territorial authorities, the regional council, and the Minister of Conservation)on the	Delete map.

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				management of development in "unplanned greenfield development areas". Noting decisions on separate plan changes must be made separately and considers this will be highly inefficient for applicants and submitters and applicants and risks inconsistency. Considers the appropriate means of providing for a combined regulatory approach is through a combined planning document to address the issue, as per section 80 of the RMA. Notes if it is Council's position this issue requires a combined approach with territorial authorities, then the appropriate means of providing for this is through a combined planning document (and the Council is obliged to consider this under section 80(7) of the RMA). Submitter notes its principal concern with this approach is it is unclear whether it would prohibit the upgrading or development of its assets. If the relief sought by submitter on definition of "unplanned greenfield development" is granted in full, submitter would consider adopting a neutral position on this map.	
S177.084	13 Maps	Map 91: Highest erosion risk land (Woody vegetation) - Te Awarua-o-Porirua.	Amend	Notes mapping of "Highest erosion risk land (Woody vegetation)" includes small areas of identified land that are incohesive. Questions value of regulating small, incohesive areas of woody vegetation, given controlled activity threshold for vegetation clearance is 200m2. Considers maps should be amended to only identify cohesive areas of woody vegetation, and remove incohesive or isolated areas. Isolated areas smaller than 200m2 should be removed from the maps to be consistent with rules.	Amend Map 91, and the associated GIS map layer, to only identify cohesive areas of "Highest erosion risk land (Woody vegetation)".
S177.085	13 Maps	Map 94: Highest erosion risk land (Woody	Amend	Notes mapping of "Highest erosion risk land (Woody vegetation)" includes small areas of identified land that are incohesive. Questions value of regulating small, incohesive areas of woody vegetation, given controlled activity threshold for vegetation clearance	Amend Map 94, and the associated GIS map layer, to only identify cohesive areas of "Highest erosion risk land (Woody vegetation)".

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		vegetation clearance) - Te Whanganui-a-Tara.		is 200m2. Considers maps should be amended to only identify cohesive areas of woody vegetation, and remove incohesive or isolated areas. Isolated areas smaller than 200m2 should be removed from the maps to be consistent with rules.	

S225 Upper Hutt City Council

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S225.001	General comments	General comments - maps	Not Stated	In GWRCs data, there are various overlaps and gaps between some of the neighbouring TAs polygons, the submitter suggests that this is likely due to the different TAs using different iterations of the StatsNZ Territorial Authorities layer.	Not stated
S225.002	General comments	General comments - current legislation	Not Stated	Not stated	That GWRC undertakes a full legal and natural justice review of the provisions in light of the evolving national direction;
S225.003	General comments	General comments - current legislation	Not Stated	Not stated	Amend to remove actions that conflict with or are more onerous than the 2023 National led government direction included in the Incoming Government Coalition agreements, November 2023 and letter from Chris Bishop dated 13 December 2023 which identifies changes to RMA, NPSFM, NESFW and NPS-IB prior to end of 2023.
S225.004	General comments	General comments - consultation	Not Stated	Not stated	Seek further work and consultation is undertaken in partnership with territorial authorities to accurately reflect roles and function in achieving outcomes and aspirations of Whaitua documents;
S225.005	General comments	General comments - maps	Amend	Not stated	Amend maps to provide more accurate information that is able to be considered at a property scale and compared with publicly available local authority data, particularly in relation to Map 88

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S225.006	General comments	General comments - current legislation	Amend	Not stated	Amend to correctly implement national planning standards;
S225.007	General comments	General comments - current legislation	Amend	Not stated	Delete or significantly amend provisions which have a lack of higher order document direction or evidentiary support;
S225.008	General comments	General comments - current legislation	Amend	Not stated	Delete or significantly amend provisions which lack of any consideration of scale and significance and apply to all development without appropriate thresholds;
S225.009	General comments	General comments - overall	Oppose	Not stated	Delete the addition of onerous requirements for existing consents;
S225.010	General comments	General comments - overall	Amend	Considers where there is a lack of clarity in definitions and policies, these fail section 32 tests	Delete or significantly amend use of definitions and policies where there is a lack of clarity.
S225.011	General comments	General comments - overall	Amend	Not stated	Delete or significantly amend policies and definitions which read as rules or conditions of consent;
S225.012	General comments	General comments - rural	Oppose	Not stated	Delete unnecessary requirements for rural properties, particularly smaller properties (between 4-20 ha);
S225.013	General comments	General comments - overall	Amend	Not stated	Amend timeframes in NRP to give reasonable timeframes to implement new direction for landowners, ensure these are reasonable and achievable and where practicable, funded from external sources;
S225.014	General comments	General comments - urban development	Oppose	Not stated	Delete provisions prohibiting urban expansion beyond existing urban zoned land, particularly where this does not align with recent rezoning notified before this plan change;
S225.015	General comments	General comments - stormwate	Oppose	Not stated	Delete or significantly amend hydrological controls for all development, which are going beyond hydraulic neutrality, as these are unclear and seem to be overly onerous;

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		r management			
S225.016	General comments	General comments - earthworks	Amend	Considers this removal will result in significant issues for territorial authorities and landowners carrying out everyday activities, with no scale included in any provisions and no rules addressing this issue.	Amend and reintroduce exclusions for "repair, sealing or resealing of a road, footpath, driveway" from definition of earthworks.
S225.017	General comments	General comments - plantation forestry	Amend	Not stated	Delete or significantly amend provisions circumventing and not giving effect to, higher order documents without clear reasoning or supporting evidence within the section 32a assessment, i.e. rules surrounding plantation forestry trying to provide a higher level of protection than is allowed under the National Environmental Standards Commercial Forestry.
S225.018	General comments	General comments - water quality improvements	Oppose	Not stated	Delete additional requirements for three waters infrastructure consents which add significant costs to upgrading infrastructure;
S225.019	General comments	General comments - definitions	Amend	Not stated	Amend proposed definition of a 'drain' that would result in all drains being considered 'modified streams';
S225.020	General comments	General comments - stormwater management	Amend	Not stated	Delete or significantly amend the addition of financial contributions, without clear justification and an understanding of how these funds and projects being delivered monitored for effectiveness to address these issues
S225.021	General comments	General comments - overall	Amend	Not stated	Seek amendment to delete references to Wellington Water throughout plan change and refer instead to water entities.
S225.022	General comments	General comments - overall	Amend	Not stated	Seek that 'and/or' used throughout this document be amended to clarify whether it is inclusive or not as 'and/or' is inappropriate.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S225.023	General comments	General comments - overall	Oppose	Considers fundamental issues with provisions requiring revision or deletion to ensure PC1 is reasonable, legally robust and practical to implement.	Seeks GWRC undertake a full legal and planning review of proposed provisions and amend PC1 to address concerns. Seeks any other consequential amendments to remedy errors and address relief sought.
S225.024	General comments	General comments - overall	Support	Supports intent to develop regional provisions to achieve water quality and ecological health objectives within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Not stated
S225.025	General comments	General comments - overall	Oppose	Concerns with process, timing, and sequencing of aspects of the notified provisions of PC1 require significant amendments. Notes numerous instances throughout PC1 where little regard to national policy direction and principles of natural justice have been considered and reasonableness /evidence base and practical implementation of provisions has been inconsistently applied. Concerned with real-world financial and resource implications, particularly for territorial authority policy and road controlling authority functions.	Not stated
S225.026	General comments	General comments - urban development	Not Stated	Considers PC1 circumvents or undermines national directives. Concerned provisions will make urban development required by NPS-UD potentially impossible to deliver, through wrapping constraints around housing intensification direction. Notes that despite the joint plan change pathway identified for 'unplanned greenfield developments', the prohibition laden objective and policy framework (both in NRP and RPS) would render future plan change an impossibility due to not implementing the higher order documents, and any section 32 analysis would be at risk of identifying development as being contrary to objectives and policies in these plans.	Not stated
S225.027	General comments	General comments - overall	Oppose	Considers GWRC has not learned from previous feedback provided by the submitter and has repeated structural problems that hamper the progress of the region. Questions the lawfulness	Seeks plan change is amended or paused to remove problematic provisions identified in submission.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				and natural justice of the process in light of the signalled change in policy direction by the government. Concerned about practical implementation of the provisions - including the ability for territorial authorities to conduct business as usual plan-making and road controlling authorities activities.	
S225.028	2 Interpretation	Afforestation	Support	Not stated	Retain as notified
S225.029	2 Interpretation	Catchment management unit	Support	Not stated	Retain as notified
S225.030	2 Interpretation	Core allocation	Amend	Supports the intent of a maintaining water resources but considers clause (c) unclear and questions relevance of July 1st 2029 date.	Seek clarity on clause C) and relevance of 1 July 2029.
S225.031	2 Interpretation	Dry weather discharges	Support	Not stated	Retain as notified
S225.032	2 Interpretation	Earthworks	Oppose	Concerns with amended definition of earthworks. Considers definition incorrectly implements national planning standards, through having "except that for the purposes of". Consider removal of other exclusions (e.g. the 'repair and maintenance of existing roads, footpaths, driveways' etc.) is fundamentally unreasonable and an issue of impracticality and cost for ongoing functions of submitter - particularly in relation to business as usual road maintenance and repair activities.	Seek amendments to correctly apply national planning standards or reintroduce all exclusions.
S225.033	2 Interpretation	Erosion and sediment management plan	Amend	Notes reference to "Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region" is identified in stabilisation definition but not in this definition or the schedules.	Seeks inclusion reference to "Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region" for consistency across plan.

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S225.034	2 Interpretation	Erosion risk treatment plan	Support	Not stated	Retain as notified
S225.035	2 Interpretation	Existing wastewater discharge	Amend	Not stated	Retain as notified, updating date to reflect a decision date for PC1, not notification date.
S225.036	2 Interpretation	Highest erosion risk land (pasture)	Amend	Support as mapped areas are consistent with areas identified as high slope in Council's Proposed Plan Change 47.	Seek consistency with District Council hazard mapping.
S225.037	2 Interpretation	High erosion risk land (pasture)	Amend	Support as mapped areas are consistent with areas identified as high slope in Council's Proposed Plan Change 47.	Seek consistency with District Council hazard mapping.
S225.038	2 Interpretation	Highest erosion risk land (woody vegetation)	Amend	Support as mapped areas are consistent with areas identified as high slope in Council's Proposed Plan Change 47.	Seek consistency with District Council hazard mapping.
S225.039	2 Interpretation	Hydrological control	Support	Not stated	Retain as notified
S225.040	2 Interpretation	Part Freshwater Management Unit	Support	Not stated	Retain as notified
S225.041	2 Interpretation	Redevelopment	Oppose	Concerned about implications definition may have on business-as-usual activities undertaken by territorial authorities and infrastructure providers. Concerned inclusion of existing roads and 'replacement' or 'reconstruction' is overly onerous	Seek that more than minor maintenance and renewals activities are a permitted or controlled activity and this is effectively reflected in definition of redevelopment.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				given end state of the environment and effects remaining the same. Considers it egregious to require 'like for like' replacements and renewals, which are often required for ongoing function of public goods, to be considered in the same vein as full redevelopments of brownfield sites.	
S225.042	2 Interpretation	Stabilisation	Support	Not stated	Retain as notified
S225.043	2 Interpretation	Stormwater catchment or sub-catchment	Support	Not stated	Retain as notified
S225.044	2 Interpretation	Stormwater management strategy	Support	Not stated	Retain as notified
S225.045	2 Interpretation	Stormwater network	Support	Not stated	Retain as notified
S225.046	2 Interpretation	Stormwater treatment system	Amend	Supports intent but none of items listed in this definition appear to be defined, e.g., what proprietary device would form part of the stormwater treatment system. Considers more flexibility and clarity if the list was not included. Also would provide clarity about whether system needs to achieve both removal of contaminants and reduce volume or only one of these.	Amend to read as follows: Stormwater treatment System A device, structure or system used to remove stormwater contaminants ~~and/or~~ to reduce stormwater volume and flows prior to discharge. ~~These include (but are not limited to):~~ ~~-rain gardens~~ ~~-green infrastructure~~ ~~-infiltration trenches~~ ~~-bioretention devices~~ ~~-vegetated swales~~ ~~-sand filters~~ ~~-green roofs~~ ~~-constructed wetlands~~ ~~-proprietary devices.~~

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S225.047	2 Interpretation	Stock unit	Amend	Concerned no consistent stock unit numbers used across New Zealand. Notes importance that numbers selected have a clear basis relating to the region that justifies differences to numbers used elsewhere e.g., the Waikato Region. Considers it easier for land owners and managers if stock units were simplified to recognise these numbers will change as stock ages. Concerns it is more of an issue for smaller properties, which are likely to have more stock variability.	Seek justification for rationalisation of stock unit numbers to make this easier for landowners.
S225.048	2 Interpretation	Unplanned greenfield development	Oppose	Opposes extent of Map 88 as does not accurately reflect Council plan change 50 notified on 4 October 2023 and is inconsistent around proposed settlement zone land. Considers provision should apply from date of PC1 decision and not date of notification. Considers it gives landowners and developers ability to complete planning processes (such as in train resource consents or plan changes). Current date as notified, would circumvent ongoing planning process and prevent rezoning submissions on active plan changes.	Amend definition to relate to corrected map provided as Attachment 2 to submission and update to date of decision not date of notification.
S225.049	2 Interpretation	Whaitua	Support	Supports implementation of Whaitua areas within NRP to align with Whaitua implementation process.	Retain definition as notified.
S225.050	5.4 Beds of lakes and rivers	Beds of lakes and rivers general conditions.	Oppose	Concerned with significant change to activities in (n). Amended wording implies that at no point are works able to be undertaken if identified birds are roosting and nesting even outside the critical period. Notes there are some birds which may nest year-round, on potentially significant infrastructure such as bridges which require maintenance.	Retain as operative, do not amend as proposed.
S225.051	6 Other methods	Method M36: Freshwater Action Plan	Amend	Supports intent of method but considers timeframes ambitious and may be amended noting government has indicated timescales are likely to change.	Amend as required to align with new government led direction on freshwater. Seeks a pause to consider new national direction may be prudent. Seeks that "and/or" used throughout this document be

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		programme.			amended to clarify whether it is inclusive or not as and/or is inappropriate.
S225.052	6 Other methods	Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	Supports intent, but considers territorial authorities be included in partnership especially since territorial authorities are identified in Whaitua implementation documents.	Seek amendments so territorial authorities are also included as partners.
S225.053	6 Other methods	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	Supports intent, but considers territorial authorities be included in partnership especially since territorial authorities are identified in Whaitua implementation documents.	Seek amendments so territorial authorities are also included as partners.
S225.054	6 Other methods	Method M41: Identifying	Amend	Supports intent but notes ongoing discussions around the Mangaroa Peatlands, which could be an	Seeks that areas identified go through a robust process, including consultation with affected landowners before any actions are identified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and responding to degradation in freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.		issue if Mangaroa Peatlands are identified as degraded wetland.	Seek that "and/or" used throughout this document be amended to clarify whether it is inclusive or not as and/or is inappropriate.
S225.055	6 Other methods	Method M42: Small farm property registration within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Oppose	Concerns with unknown registration process, noting it will be too onerous for owners of small lifestyle blocks undertaking this level of assessment with limited time and financial resources.	Delete this method in its entirety and for provisions in this plan change to relate solely to farms over 20ha.
S225.056	6 Other methods	Method M43: Supporting the health of urban waterbodies.	Amend	Supports intent but not the reference to Wellington Water as future of water delivery model in the region is unclear. Notes clause 3(c) appears to point to a regulatory response in a non-regulatory method, considers this to be inappropriate.	Seek amendment to delete references to Wellington Water throughout the plan change and refer instead to water entities.

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S225.057	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Support	Not stated	Delete clause 3(c) or amend so that this is a non-regulatory method.
S225.058	6 Other methods	Method M45: Funding of wastewater and stormwater network upgrades	Amend	Concerned that this is unclear if territorial authorities are being consulted on funding opportunities or expected to financially contribute.	Amend for clarity noting that territorial authority's already have stretched budgets that are unlikely to be able to fund works not already anticipated in the long term plan processes.
S225.059	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.	Support	Not stated	Retain as notified acknowledging that this is an aspirational objective that would be difficult to measure.
S225.060	8 Whaitua Te	Objective WH.O2: The health	Support	Supports in principle but may have specific comments on policies and rules that implement this objective.	Retain as notified

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	Whanganui-a-Tara	and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora.			
S225.061	8 Whaitua Te Whanganui-a-Tara	Objective WH.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved	Support	Supports in principle but may have specific comments on policies and rules that implement this objective.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		to achieve the coastal water objectives set out in Table 8.1.			
S225.062	8 Whaitua Te Whanganui-a-Tara	Objective WH.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status.	Support	Supports in principle but may have specific comments on policies and rules that implement this objective.	Retain as notified
S225.063	8 Whaitua Te	Objective WH.O6:	Amend	Supports intent but concerned salt water intrusion may not be fully avoided. Considers salt water	Amend to read: .....(a) ensure base flows or levels in surface water bodies

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	Whanganui-a-Tara	Groundwater flows and levels, and water quality, are maintained.		intrusion is occurring in many areas and all that can often be done is to manage and mitigate.	and springs are supported and salt-water intrusion is **minimised** ~~avoided,~~ and
S225.064	8 Whaitua Te Whanganui-a-Tara	Objective WH.O8: Primary contact sites within Te Awa Kairangi/Hutt River, Pākuratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact.	Support	Supports in principle but may have specific comments on policies and rules that implement this objective.	Retain as notified
S225.065	8 Whaitua Te Whanganui-a-Tara	Objective WH.O9: Water quality, habitats, water quantity and ecological processes of rivers	Support	Supports in principle but may have specific comments on policies and rules that implement this objective.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		are maintained or improved.			
S225.066	8 Whaitua Te Whanganui-a-Tara	Policy WH.P1: Improvement of aquatic ecosystem health.	Amend	Concerned about practicality of working on reducing contaminants all at once.	Seek clarification on whether (a) to (c) is achievable within the ten-year planning cycle or whether some contaminants should be prioritised.
S225.067	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Oppose	Opposes prohibition of development, as it limits options to give effect to NPS-UD and overrides District Plan changes and reviews currently underway or proposed in future. Considers greenfield development has more opportunity to address effects, particularly given space available to incorporate design and infrastructure solutions when compared to constrained urban environments. Notes prohibition in policy, and direction in objective above it, would render a future plan change an impossibility as it wouldn't implement higher order documents. Considers the section 32 analysis would need to consider provisions PC1 and recent changes to NRP and therefore would be at risk of being contrary to objectives and policies in these plans.	Seek that the policy is amended to read: ... "(a) ~~prohibiting~~ **managing** 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"
S225.068	8 Whaitua Te Whanganui-a-Tara	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing	Amend	Supports intent, but considers territorial authorities be included in partnership especially since territorial authorities are identified in Whaitua implementation documents.	Seek amendments so that territorial authorities are also included as partners.

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		of waterways.			
S225.069	8 Whaitua Te Whanganui-a-Tara	Policy WH.P4: Achievement of the visual clarity target attribute states.	Amend	Supports intent but considers it overly ambitious to achieve	Introduce interim targets rather than trying to achieve this in a short timescale.
S225.070	8 Whaitua Te Whanganui-a-Tara	Policy WH.P5: Localised adverse effects of point source discharge.	Amend	Concerned current drafting is unclear and requires redrafting.	Amend to read: "... The localised adverse effects of point source discharges to freshwater and coastal water beyond the zone of reasonable mixing are avoided or minimised, including ~~by avoiding~~: (a) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (b) ..."
S225.071	8 Whaitua Te Whanganui-a-Tara	Policy WH.P6: Cumulative adverse effects of point source discharges.	Amend	Supports intent of managing cumulative adverse effects but notes wording of (b)(i) is unclear as "upgrading the discharge" could mean increasing discharge. Considers this is not intent of policy.	Clarify what is meant by (b)(i).
S225.072	8 Whaitua Te Whanganui-a-Tara	Policy WH.P7: Discharges to groundwater.	Oppose	Concerned drafting of "All activities on land" ultimately leads to discharges to ground water, including animal effluent, sprays and other common activities. Considers policy not specific and does not identify clearly which discharges are being addressed. Notes this is a significant change for any existing discharges i.e. all existing land use which may or not have required consents under district plans and	Amend to clarify which discharges this policy relates.

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				needs to be much more clear, directive and measurable. Appears policy has not been well considered and is unclear as to what is trying to be achieved.	
S225.073	8 Whaitua Te Whanganui-a-Tara	Policy WH.P8: Avoiding discharges of specific products and waste.	Oppose	Concerned high level policy relating to storm water network where consents already exist. Questions whether responsibility of consent holder to manage and monitor? Notes no specific thresholds so questions if washing cars and houses, animals confined in a paddocks, or driveways require a consent. Notes no consideration for environmentally friendly cleaning products. Considers scale for wet cement unclear, and questions if it relates to larger scale developments or small scale activities where cement pads are constructed for heat pump fans or sheds etc. Latter would be unworkable and unenforceable. Appears policy has not been well considered and is unclear what it is trying to achieve.	Seek clarity on what animal effluent and what chemical cleaner as it is impossible to manage back yard cats and dogs for example, and not all chemical cleaners are the same. Identify scale for wet cement provision. Amend to clarify which discharges this policy relates.
S225.074	8 Whaitua Te Whanganui-a-Tara	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Not Stated	Concerned there are no thresholds applied to policy and is unclear if this relates to stormwater network consents or other stormwater consents and in rural areas where it is likely water will go to ground eventually.	Seek clarification on what is being addressed in this policy and associated thresholds.
S225.075	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of	Amend	Concerned chapeau of policy is too broad and questions whether, in relation to (c)(ii), is it also appropriate to include attenuation? Unclear what is meant by "load reduction factor" and concerned this might not be practical at an	The scope of this policy should be narrowed to apply only to stormwater networks not individual developments within a network, except for point source discharges to surface water. This should not apply to one house or rural scenarios which

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		stormwater discharges.		individual scale where discharge from site is into a stormwater network such as an individual house. Notes may be inappropriate for rural properties where a small discharge to land after rainwater collection, for example. Maintenance required for these types of stormwater treatment systems to be effective is inappropriate for individual properties and likely to result in failure.	discharge directly to land via soak pits or other similar systems.
S225.076	8 Whaitua Te Whanganui-a-Tara	Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy.	Amend	Supports intent to improve water quality through managing stormwater contaminants, however, considers cost implication of policy needs to be funded.	Retain as notified except seek that "and/or" used throughout this document be amended to clarify whether it is inclusive or not as and/or is inappropriate. Support councils with funding.
S225.077	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Supports intent of improving water quality by managing stormwater contaminants, but considers thresholds for application must be reviewed and clarified. Concerned with application of definition for 'redevelopment' in policy, particularly in case of resurfacing, or 'like for like' replacement of surfaces where there is no change to end state water run-off. Considers it inappropriate and unjust to require onsite stormwater systems to be installed, due to the 'like for like' replacement of impervious surfaces. Considers this places unnecessary burden on land owners seeking to undertake maintenance of their properties.	Amend the definition of redevelopment and review the practicality of thresholds where this policy applies.
S225.078	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater	Oppose	Concerned with financial implications on Requiring Authorities (particularly territorial authorities). Refer to comments on new financial contributions provisions in Schedule 30.	Delete the policy or amend substantially so that this does not place an unrealistic burden on greenfield development that is needed to meet the higher order national direction of the NPS-UD.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		contaminant offsetting for new greenfield development.			
S225.079	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Oppose	Concerns with implications and practicality of policy.	Delete policy or amend significantly to change from 'avoid' to 'minimise' and specifically this should not apply to developments that feed into an existing stormwater network that will have an existing stormwater consent.
S225.080	8 Whaitua Te Whanganui-a-Tara	Policy WH.P18: Progressing works to meet Escherichia coli target attribute states.	Amend	Supports intent to meet E.coli Target Attribute States, but considers it unclear who will be expected to undertake this work, and who will fund projects. Notes improving these will require significant investment in wastewater infrastructure and land owners to exclude stock and manage septic tank discharges. Considers lack of clarity in provision and others throughout PC1, fails to follow basic section 32 processes in development of the plan change, which require identification of implications of provisions, and whether they are more appropriate provisions to achieve outcomes, including an identification of who would be responsible for the implementation of requirements and the implications on those parties.	Seek clarity on who will be the delivery agency and who is responsible for funding.
S225.081	8 Whaitua Te Whanganui-a-Tara	Policy WH.P19: Managing wastewater network catchment	Amend	Supports intent, but is concerned the cost will fall on ratepayers. Considers this requires significant thought and consultation with territorial authorities and their communities around costs. Considers lack of clarity in provision and others throughout PC1 fails to follow basic section 32 processes in	Seek that consultation is undertaken with territorial authorities and their communities, and that the timeframes are realistic and achievable within the resource constraints of Councils and their communities. Seek that and/or used throughout this document be

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discharges .		development of PC1, which require identification of implications of provisions, a thorough cost and benefit analysis of provisions, and whether these are the more appropriate provisions to achieve outcomes, including an identification of who would be responsible for the implementation of requirements and the implications on those parties.	amended to clarify whether it is inclusive or not as and/or is inappropriate.
S225.082	8 Whaitua Te Whanganui-a-Tara	Policy WH.P20: Managing existing wastewater treatment plant discharges .	Amend	Supports intent, but is concerned the cost will fall on ratepayers. Considers this requires significant thought and consultation with territorial authorities and their communities around costs.	Seek that consultation is undertaken with territorial authorities and their communities, and that the timeframes are realistic and achievable within the resource constraints of Councils and their communities.
S225.083	8 Whaitua Te Whanganui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Amend	Concerned this is a substantial change for livestock farmers and horticulture and will result in need for them to change practices significantly at great cost in a time when they are suffering from a cost of living crisis and New Zealand is struggling with a food security issue. Notes need to be supported by funding and guidance.	Seek clarity on how this will be implemented and funded, and the support that will be provided to achieve this.
S225.084	8 Whaitua Te Whanganui-a-Tara	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from	Oppose	Considers it unclear what is meant by "smaller rural properties", questions if intended is to be captured by thresholds under (c)? Note it appears to duplicate much of policy WH.P21 and WH.P23, see comments on WH.P21.	Delete this policy and combine with policy WH.P21 and provide clarity on what is meant by 'smaller farms'.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		farming activities.			
S225.085	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	Considers policy is going to incur significant costs for landowners and could mean retirement of large areas of land which will reduce productive capacity on site with consequential economic effects. Refer to previous comments on cost of living and food security.	Retain largely as notified, with particular emphasis on clause (d) to support implementation for landowners, including funding and guidance to assist them through the transition.
S225.086	8 Whaitua Te Whanganui-a-Tara	Policy WH.P24: Phasing of farm environment plans.	Amend	Policy is supported in principle but considers given the large number of landowners in the district, this is overly ambitious, particularly if plan change is not operative by then, which is entirely possible given timeframe over which the operative NRP took to develop. Considers use of and/or is inappropriate.	Seek that extended timeframes for implementation are considered and that the policy is amended to read: Farm environment plans required in accordance with Policy WH.P22 and Policy WH.P23 shall be provided according to a phased timetable that prioritises those part Freshwater Management Units where Table 8.4 shows that suspended fine sediment has a baseline state of D ~~and/or~~ where dissolved inorganic nitrogen is shown as being in need of improvement, and so that, in all cases, farm environment plans are prepared and certified by 30 June 20~~2732.~~
S225.087	8 Whaitua Te Whanganui-a-Tara	Policy WH.P25: Managing rural land use change.	Oppose	Considers this overly onerous on small properties and considers other policies will apply that already impose significant costs to landowners and regional ratepayers to fund this work for a marginal level of improvement above other mandatory requirements proposed in this plan change. Numerous smaller properties have limited production occurring on them and the registration process set out in Schedule 35 appears particularly onerous for smaller properties.	Delete this policy and associated provisions, such as Schedule 35, and focus on larger properties where more meaningful outcomes can be achieved.
S225.088	8 Whaitua Te	Policy WH.P26:	Amend	Supports intent to exclude livestock to streams where water quality is poor. Considers stock	Seek acknowledgement of pest species contribution to e.coli in these areas and management of these pests within the

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	Managing livestock access to small rivers.		exclusions should be flexible enough to not require fencing in steep areas where stock are not anticipated to go. Seeks acknowledgment that pest species including deer, pigs and goats are a substantial issue in these areas - particularly in Mangaroa valley, these pest species have flourished. Considers the most practicable options should be considered for exclusion of access to these streams.	regional parks and forests which surround the Mangaroa River catchment.
S225.089	8 Whaitua Te Whanganui-a-Tara	Policy WH.P27: Promoting stream shading.	Support	Not stated	Retain as notified
S225.090	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Oppose	Considers policy appears to conflict with requirements of NES-CF.	Delete policy.
S225.091	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Amend	Considers these are all reasonable things to include as conditions of consents for larger projects, but may not be reasonable for small scale projects such as the maintenance of driveways and footpaths, which are now considered earthworks, in accordance with amended definition.	Amend to clearly identify scale or threshold this policy should apply at.
S225.092	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Oppose	Concerned policy reads more like a rule or standard rather than outlining how an objective will be implemented.	Delete policy or amend to be a policy rather than a rule or standard.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S225.093	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose	Concerned policy reads more like a rule or standard rather than outlining how an objective will be implemented.	Delete policy or amend to be a policy rather than a rule or standard.
S225.094	8 Whaitua Te Whanganui-a-Tara	Rule WH.R1: Point source discharges of specific contaminants - prohibited activity.	Oppose	Concerned with: - lack of thresholds or scope of rule application - lack of specificity - some vehicle cleaning products are biodegradable and less harmful to the environment than others - fundamental inability to monitor against this rule - some of these in small quantities may be suitable for discharging to land, e.g. biodegradable cleaning products, cooking oil. As written, means that washing any car or washing house windows or walls would be a prohibited activity. Should a car fail, such as a boiled radiator or oil leak, this would also be a prohibited activity. Considers prohibited activities need to be clear and measurable without any need for interpretations and appears this rule has not been fully considered - particularly as to its purpose, applicability and practical (and reasonable) implementation.	Delete or significantly rewrite to a more specific and reasonable approach. If a rule like this is retained, seek a more permissive activity status such as restricted discretionary. However, we note that it is impractical to require consent for these small scale activities, such as washing windows. If retained, this rule needs further consideration.
S225.095	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Support	Not stated	Retain as notified
S225.096	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual property to	Support	Not stated	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		surface water or coastal water - permitted activity.			
S225.097	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Support	Not stated	Retain as notified
S225.098	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Concerns with application of the definition of 'redevelopment'. Concerns the 1000m2 threshold will result in fairly small developments including upgrading and maintenance activities requiring a consent, which is overly onerous particularly for Council's business as usual functions. Calculations have identified that should Councils want to maintain or renew over 50 linear metres of road, this would require a resource consent. Considers this would result in an arduous, costly and inefficient process that will place a great burden on existing resources (both financial and staff), and has no consideration or recognition of roles and functions of territorial authorities as road controlling authorities.	Amend to remove the 1000m2 threshold in relation to upgrading, maintaining and renewing of existing roads, footpaths/cyclepath and driveways.
S225.099	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield	Oppose	Concerned implications of this rule would mean application of financial contributions and costly significant upgrades, given requirements to both include costly stormwater systems within	Delete or amend to remove thresholds and financial contributions. Seek that and/or used throughout this document be

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		impervious surfaces - controlled activity.		developments, as well as pay financial contributions under schedule 30 (i.e. double dipping of cost).	amended to clarify whether it is inclusive or not as and/or is inappropriate.
S225.100	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Oppose	Concerned implications of this rule would mean application of financial contributions and costly significant upgrades, given requirements to both include costly stormwater systems within developments, as well as pay financial contributions under schedule 30 (i.e. double dipping of cost).	Delete or amend to remove thresholds and financial contributions. Seek that and/or used throughout this document be amended to clarify whether it is inclusive or not as and/or is inappropriate.
S225.101	8 Whaitua Te Whanganui-a-Tara	Rule WH.R9: Stormwater from a local authority or state highway network-restricted discretionary activity.	Oppose	Opposed to requirement for every maintenance and renewal project, being required to apply for restricted discretionary activity status for stormwater from road. Provision identifies a fundamental lack of understanding about roles and functions of Council's (and other territorial authorities' within the region) as a road controlling authority and practicalities and implementation costs associated with provision. Considers discharges would be entering an existing stormwater network, which has an existing management strategy, and it is not appropriate to require additional management of discharges which are managed by Network discharge consents.	Delete rule or amend to remove local authority roads where these are already addressed through the stormwater network discharge consent. Seek that 'and/or' used throughout this document be amended to clarify whether it is inclusive or not as 'and/or' is inappropriate.
S225.102	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redevelop	Oppose	Concerned with implications of the 'redevelopment' definition and lack of thresholds both in Policy WH.P14 and this rule. Refer to comments on the 'redevelopment' definition and WH.P14.	Review definition of redevelopment and consider application of thresholds where both Policy WH.P14 and this rule apply.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		ed impervious surfaces - discretionary activity.			
S225.103	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Amend	Submitter refers to other rules which default into this non-complying rule.	Seek that this rule is reviewed and any consequential amendments made in relation to concerns raised in submission, in respect of other inter-related provisions.
S225.104	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Concerns with the implications and practicality of this rule and identifies that prohibition in policy, and the direction in objective above it, would effectively render a future plan change an impossibility because it would not be implementing higher order documents. Section 32 analysis for such a plan change would need to consider provisions in PC1 and recent changes to NRP and therefore would be at risk of being contrary to objectives and policies in these plans.	Delete rule or amend significantly to change from prohibited and provide a consenting pathway for unplanned greenfield developments. Seek this specifically should not apply to developments feeding into existing stormwater networks that will have an existing stormwater network discharge consent.
S225.105	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Oppose	Considers this does not appear to align with requirements of NESCF.	Delete rule.
S225.106	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry - discretionary activity.	Oppose	Considers this does not appear to align with requirements of NESCF.	Delete rule.
S225.107	8 Whaitua Te	Rule WH.R23:	Oppose	Concerns with implications of amending earthworks definition, and implications for this rule. Considers	Amend provisions to address the following key functions of territorial authorities as road controlling authorities:

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	Earthworks - permitted activity.		clause 16 changes to the provision significantly improve outcomes for landowners and public, but submitter remains of the opinion the removal of exclusions from definitions of earthworks, significantly affect submitters ability to undertake business as usual maintenance and renewals particularly for local authority roads, footpaths and cycle paths. Considers it more appropriate to include these activities as permitted activities, given their effects are well understood, and can be managed by permitted activity standards.	1. need to cover road maintenance and upgrading, including reseal 2. upgrading of underground networks 3. replacement of signs and traffic/speed management 4. repair, maintenance and upgrading of pedestrian and cycle facilities Seek that and/or used throughout this document be amended to clarify whether it is inclusive or not as and/or is inappropriate.
S225.108	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Oppose	Concerns with application of amended earthworks definition and implications for this rule. Concerns resource consent would be required for every 150 linear metres of road, based on an average 20 m road width. Scale at which resource consents would apply for every territorial authority in the region, would be an extremely onerous. Considers amended permitted activity standards are a far more appropriate way to manage sediment run-off concerns.	Amend suite of provisions to address and reflect the requirements and functions of territorial authorities as road controlling authorities, which appropriate permitted activity standards to manage effects. Seek that and/or used throughout this document be amended to clarify whether it is inclusive or not as and/or is inappropriate.
S225.109	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Amend	Submitter refers to other rules which default into this non-complying rule.	Seek rule is reviewed and any consequential amendments made in relation to concerns raised in submission, in respect of other inter-related provisions.
S225.110	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares -	Oppose	Opposed to additional burden this will place on small landowners. Notes a different threshold throughout PC1 where properties over 5 ha are identified rather than 4 ha. Considers many of these smaller properties have limited production occurring on them and registration process set out in Schedule 35 appears to be particularly onerous for smaller properties.	Delete rule and associated provisions, such as Schedule 35, and focus on larger properties where more can be achieved.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
S225.111	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Support	Not stated	Retain as notified
S225.112	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Concerned this could potentially burden landowners, date could also give people no time especially if the NRP Plan Change 1 takes a while to go through the process. Seeks acknowledgment that Pest species including deer, pigs and goats that are a substantial issue in these areas - particularly in the Mangaroa valley. Consider that the most practicable options should be considered for the exclusion of access to these streams.	Seek acknowledgment that pest species including deer, pigs and goats are a substantial issue in areas - particularly in Mangaroa Valley.
S225.113	8 Whaitua Te Whanganui-a-Tara	Rule WH.R29: Livestock access to a small river - discretionary activity.	Amend	Supports intent but concerned timeframe identified is unrealistic given this goes beyond regulations in the NESFW, and due to costs it is unrealistic to ask landowners to go that fast, especially given the focus on current NES requirements first and streams may be in steep areas which are harder to fence. Seeks acknowledgment pest species including deer, pigs and goats are a substantial issue in these areas - particularly in Mangaroa valley. Seeks this provision is supported by pest management on GW land to prevent pest species entering landowners properties.	Seek timeframe amended to end of 2026 so relevant landowners are able to understand it prior to being required to comply with rule. Seek flexibility on how stock exclusion is managed. Seek provision supported by pest management on GW land to prevent pest species entering land owners properties.
S225.114	8 Whaitua Te Whanganui-a-Tara	Rule WH.R30: The use of land for	Amend	Concern related to affordability and achievability of provisions are expressed in relation to policies which are related to this rule.	Seek that consultation is undertaken affected landowners, and timeframes are realistic and achievable within resource constraints of communities.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		farming activities - discretionary activity.			
S225.115	8 Whaitua Te Whanganui-a-Tara	Rule WH.R31: Change of rural land use - discretionary activity.	Amend	Concern related to affordability and achievability of provisions are expressed in relation to policies which are related to this rule.	Seek plan change process is paused and direct consultation is undertaken with affected landowners, and timeframes are realistic and achievable within resource constraints of communities.
S225.116	8 Whaitua Te Whanganui-a-Tara	Rule WH.R32: Farming activities - non-complying activity.	Amend	Submitter refers to other rules which default into this non-complying rule.	Seek rule is reviewed and any consequential amendments made in relation to concerns raised in submission, in respect of other inter-related provisions.
S225.117	12 Schedules	Schedule 27: Freshwater Action Plan requirements.	Amend	Notes these are non-regulatory and broadly supports their intent but notes local authorities should also be a partner not just a consultee. Notes regulatory requirements that might come out of the actions in B3 should go through an appropriate process.	Seek freshwater action plans are developed in partnership with local authorities and any regulatory actions identified under B3 go through appropriate process. Seek that and/or used throughout this document be amended to clarify whether it is inclusive or not as and/or is inappropriate.
S225.118	12 Schedules	Schedule 28: Stormwater Contaminant Treatment.	Amend	Supports intent of policy, but detail requirements may be inappropriate for individual small scale developments. Supports this for new impervious surfaces of a certain size, such as over 1000m2 but for redeveloped surfaces, considers it overly onerous and inappropriate.	Seek a scale and significance assessment is undertaken for the application of schedule. Seek that a threshold be applied to schedule. Seek that redevelopment is excluded from schedule.
S225.119	12 Schedules	Schedule 29: Stormwater Impact Assessments.	Amend	Supports intent of schedule but is concerned 3,000m2 is a low trigger for a discretionary activity if redevelopment and road maintenance continue to be included.	Seek more appropriate threshold is identified for redevelopment, or relief sought in relation to definition of redevelopment may address relief sought by submitter.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S225.120	12 Schedules	Schedule 30: Financial Contributions.	Oppose	Concerned this will place increased burden on infrastructure providers and landowners. Considers the Section 32 analysis and economic analysis for the level of contribution appears to focus on greenfield development and not implications this will have on requiring authorities. Notes it does not assess whether this, and the associated provision framework, including WH.R26 is the most efficient and appropriate way to achieve the purpose of the act. Instead, this specific requirement is assessed as an options package alongside other unrelated provisions. The section 32 assessment does not consider this schedule leads to double dipping, because rule WH.R26 (e) only appears to require that 85% of annual mean runoff is captured but we consider that this is a step too far and unrealistic. Does not appear to be justification that GWRC can achieve meaningful further reductions beyond 85% at source to provide sufficient rational for the financial contributions to be levied. Does not appear to acknowledge requirements in schedule 31 and costs of meeting those requirements including point 2 of schedule 31"....how the stormwater network will be managed through time, to improve the adverse acute, chronic and cumulative effects of stormwater discharges on surface water bodies, groundwater and coastal water...". Concerned the contributions could be used outside of Freshwater Management Unit from where the contribution was collected. Also appears to be a lack of justification for the roading charges in the economic assessment.	Review rationale and justified basis for proposed financial contributions, as it appears these provisions have not fully been considered. Remove requirements to pay financial contributions for further treatment where people are already providing treatment as part of their development.
S225.121	12 Schedules	Schedule 31: Stormwater Management	Amend	Intent is supported but it is unclear in the schedule who is expected to develop and implement a stormwater management strategy under schedule 31 within context of existing uncertainties around three waters reform, or how this will be funded.	Provide clarity on who will develop, fund and implement stormwater management strategy. Seek that and/or used throughout this document be amended to clarify whether it is inclusive or not as and/or is inappropriate.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.			
S225.122	12 Schedules	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Amend	Considers this should also refer to Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).	Include reference to Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021) for consistency across plan.
S225.123	12 Schedules	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	Amend	Considers this should also refer to Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).	Include reference to Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021) for consistency across plan.
S225.124	12 Schedules	Schedule 35: Small farm registration.	Oppose	Concerned about increased burden on landowners. Considers Section 32 analysis does not assess if this, and the associated provision framework, including WH.R26 is the most efficient and appropriate way to achieve purpose of act. Instead, this specific requirement is assessed as an options package alongside other unrelated provisions.	Remove the requirement for small farm registration and address relief sought in rule WH.R26
S225.125	12 Schedules	Schedule 36: Additional requirements for Farm	Amend	Supports intent of Schedule 36 but is concerned timeframe is unachievable, particularly as this could involve slower techniques, since slopes can be difficult to access and very costly to plant and manage. Notes requirement is going to incur significant costs for landowners and could mean	Seek timeframes are achievable. Seek support for implementation for landowners, including funding and guidance to assist them through transition.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.		retirement of large areas of land that will reduce the productive capacity on site with consequential economic effects.	
S225.126	13 Maps	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Not Stated	Opposes extent of Map 88 as this does not accurately reflect UHCC Plan Change 50 notified on 4 October 2023, and is inconsistent around settlement zone land. Considers it also does not reflect UHCC Plan Change 49, notified on 11 August 2021. Provision should apply from the date of PC1 decision and not date of notification. This would give landowners and developers ability to complete planning processes (such as in train resource consents or plan changes). Current date as it is notified, would circumvent these ongoing planning process and prevent rezoning submissions on active plan changes.	Amend map to reflect Map 1 attached to our submission to include all land rezoned under PC49 and PC50, including all settlement zone, as 'planned' and reflect other active plan changes within the Wellington Region. Updating date to reflect a decision date for PC1, not notification date.
S225.127	13 Maps	Map 93: Highest and high erosion risk land (Pasture) - Te Whanganui-a-Tara.	Oppose	Not stated	Not stated
S225.128	13 Maps	Map 94: Highest erosion risk land (Woody	Oppose	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		vegetation clearance) - Te Whanganui-a-Tara.			

S072 Upper Hutt Rural Communities - Angela Marie Greig

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
72.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
72.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.
72.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
72.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as	Give equal weight to all government legislation and disregard regulation by committee.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	
72.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
72.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	Defer any further action on PC1 pending gathering an effective database.
72.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
72.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
72.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
72.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
72.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.
72.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river -	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
72.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S059 Upper Hutt Rural Communities - Bob Anker

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S59.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
S59.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.
S59.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S59.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	Give equal weight to all government legislation and disregard regulation by committee.
S59.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
S59.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	Defer any further action on PC1 pending gathering an effective database.
S59.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S59.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
S59.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
S59.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
S59.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S59.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
S59.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S078 Upper Hutt Rural Communities - Bob Curry

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
78.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
78.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.
78.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and	Remove clauses where there is an insufficient network of water quality monitoring sites.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	
78.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	Give equal weight to all government legislation and disregard regulation by committee.
78.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
78.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	Defer any further action on PC1 pending gathering an effective database.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
78.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
78.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
78.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
78.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
78.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				measures will have substantial costs and may result in minimal water quality improvements.	
78.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
78.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S079 Upper Hutt Rural Communities - Bob McLellan

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
79.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
79.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
79.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
79.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	Give equal weight to all government legislation and disregard regulation by committee.
79.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
79.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand	Defer any further action on PC1 pending gathering an effective database.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	
79.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
79.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
79.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
79.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
79.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	
79.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
79.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S071 Upper Hutt Rural Communities - Brendon Allen Greig

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
71.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
71.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
71.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
71.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	Give equal weight to all government legislation and disregard regulation by committee.
71.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
71.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the	Defer any further action on PC1 pending gathering an effective database.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	
71.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
71.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
71.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
71.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
71.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	
71.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
71.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S080 Upper Hutt Rural Communities - Bridget M Myles

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
80.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
80.002	General comments	General comments	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		- current legislation		PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	
80.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
80.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	Give equal weight to all government legislation and disregard regulation by committee.
80.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
80.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of	Defer any further action on PC1 pending gathering an effective database.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	
80.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
80.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
80.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
80.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
80.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	
80.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
80.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S063 Upper Hutt Rural Communities - Callum Graeme Ritchie Forbes

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
63.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
63.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.
63.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
63.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	Give equal weight to all government legislation and disregard regulation by committee.
63.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
63.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	Defer any further action on PC1 pending gathering an effective database.
63.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
63.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
63.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
63.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Upper Hutt have moved away from dairy farming, prior problems have been resolved.	
63.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.
63.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
63.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S088 Upper Hutt Rural Communities - Colleen Munro

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
88.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
88.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.
88.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
88.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not	Give equal weight to all government legislation and disregard regulation by committee.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				recognised in NPS-FM. Determines that this is a case of legislation by committee.	
88.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
88.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	Defer any further action on PC1 pending gathering an effective database.
88.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
88.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
88.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
88.010	8 Whaitua Te	8.2.4 Rural land	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	use and earthworks		for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	
88.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.
88.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
88.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				and uncertainty associated with resource consent requirements	course of action which may be at variance to thee drafted regulations.

S060 Upper Hutt Rural Communities - Darren Pettengell

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
60.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
60.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.
60.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
60.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was	Give equal weight to all government legislation and disregard regulation by committee.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	
60.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
60.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	Defer any further action on PC1 pending gathering an effective database.
60.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
60.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
60.009	2 Interpretation	Small stream riparian	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		programme			
60.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
60.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.
60.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
60.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S081 Upper Hutt Rural Communities - David McCready

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
81.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
81.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.
81.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
81.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned	Give equal weight to all government legislation and disregard regulation by committee.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	
81.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
81.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	Defer any further action on PC1 pending gathering an effective database.
81.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
81.008	General comments	General comments - economic	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		cost/impact			
81.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
81.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
81.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.
81.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		river - permitted activity.			
81.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S068 Upper Hutt Rural Communities - Gain Thomson

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
68.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
68.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.
68.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
68.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	Give equal weight to all government legislation and disregard regulation by committee.
68.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
68.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	Defer any further action on PC1 pending gathering an effective database.
68.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
68.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
68.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
68.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
68.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
68.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
68.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S091 Upper Hutt Rural Communities - Graeme Shellard

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
91.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
91.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.
91.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and	Remove clauses where there is an insufficient network of water quality monitoring sites.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	
91.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	Give equal weight to all government legislation and disregard regulation by committee.
91.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
91.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	Defer any further action on PC1 pending gathering an effective database.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
91.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
91.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
91.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
91.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
91.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				measures will have substantial costs and may result in minimal water quality improvements.	
91.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
91.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S087 Upper Hutt Rural Communities - Grant Munro

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
87.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
87.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
87.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
87.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	Give equal weight to all government legislation and disregard regulation by committee.
87.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
87.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand	Defer any further action on PC1 pending gathering an effective database.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	
87.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
87.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
87.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
87.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
87.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	
87.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
87.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S062 Upper Hutt Rural Communities - Jacqui Thompson

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
62.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
62.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
62.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
62.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	Give equal weight to all government legislation and disregard regulation by committee.
62.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
62.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the	Defer any further action on PC1 pending gathering an effective database.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	
62.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
62.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
62.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
62.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
62.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	
62.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
62.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S086 Upper Hutt Rural Communities - Jennifer Sparrow

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
86.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
86.002	General comments	General comments	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		- current legislation		PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	
86.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
86.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	Give equal weight to all government legislation and disregard regulation by committee.
86.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
86.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of	Defer any further action on PC1 pending gathering an effective database.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	
86.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
86.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
86.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
86.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
86.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	
86.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
86.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S089 Upper Hutt Rural Communities - Joan Elizabeth Hutson

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
89.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
89.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.
89.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
89.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	Give equal weight to all government legislation and disregard regulation by committee.
89.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
89.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	Defer any further action on PC1 pending gathering an effective database.
89.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
89.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
89.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
89.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Upper Hutt have moved away from dairy farming, prior problems have been resolved.	
89.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.
89.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
89.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S077 Upper Hutt Rural Communities - JoAnn McCready

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
77.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
77.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.
77.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
77.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not	Give equal weight to all government legislation and disregard regulation by committee.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				recognised in NPS-FM. Determines that this is a case of legislation by committee.	
77.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
77.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	Defer any further action on PC1 pending gathering an effective database.
77.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
77.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
77.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
77.010	8 Whaitua Te	8.2.4 Rural land	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	use and earthworks		for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	
77.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.
77.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
77.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				and uncertainty associated with resource consent requirements	course of action which may be at variance to thee drafted regulations.

S070 Upper Hutt Rural Communities - John Peter Boyle

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
70.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
70.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.
70.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
70.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was	Give equal weight to all government legislation and disregard regulation by committee.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	
70.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
70.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	Defer any further action on PC1 pending gathering an effective database.
70.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
70.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
70.009	2 Interpretation	Small stream riparian	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		programme			
70.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
70.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.
70.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
70.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S066 Upper Hutt Rural Communities - Jon-Luke Clarke Harvey

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
66.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
66.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.
66.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
66.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned	Give equal weight to all government legislation and disregard regulation by committee.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	
66.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
66.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	Defer any further action on PC1 pending gathering an effective database.
66.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
66.008	General comments	General comments - economic	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		cost/impact			
66.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
66.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
66.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.
66.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		river - permitted activity.			
66.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S084 Upper Hutt Rural Communities - Karen Nash

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
84.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
84.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.
84.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
84.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	Give equal weight to all government legislation and disregard regulation by committee.
84.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
84.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	Defer any further action on PC1 pending gathering an effective database.
84.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
84.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
84.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
84.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
84.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
84.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
84.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S083 Upper Hutt Rural Communities - Kevin Nash

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
83.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
83.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.
83.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and	Remove clauses where there is an insufficient network of water quality monitoring sites.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	
83.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	Give equal weight to all government legislation and disregard regulation by committee.
83.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
83.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	Defer any further action on PC1 pending gathering an effective database.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
83.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
83.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
83.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
83.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
83.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				measures will have substantial costs and may result in minimal water quality improvements.	
83.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
83.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S061 Upper Hutt Rural Communities - Lenard Drabble

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
61.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
61.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
61.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
61.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	Give equal weight to all government legislation and disregard regulation by committee.
61.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
61.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand	Defer any further action on PC1 pending gathering an effective database.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	
61.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
61.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
61.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
61.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
61.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	
61.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
61.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S064 Upper Hutt Rural Communities - Linda Forbes Williamson

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
64.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
64.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
64.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
64.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	Give equal weight to all government legislation and disregard regulation by committee.
64.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
64.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the	Defer any further action on PC1 pending gathering an effective database.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	
64.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
64.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
64.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
64.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
64.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	
64.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
64.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S075 Upper Hutt Rural Communities - Lynn Marion Bialy

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
75.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
75.002	General comments	General comments	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		- current legislation		PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	
75.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
75.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	Give equal weight to all government legislation and disregard regulation by committee.
75.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
75.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of	Defer any further action on PC1 pending gathering an effective database.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	
75.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
75.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
75.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
75.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
75.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	
75.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
75.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S082 Upper Hutt Rural Communities - Meaghan Fitzgerald

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
82.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
82.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.
82.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
82.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	Give equal weight to all government legislation and disregard regulation by committee.
82.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
82.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	Defer any further action on PC1 pending gathering an effective database.
82.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
82.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
82.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
82.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Upper Hutt have moved away from dairy farming, prior problems have been resolved.	
82.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.
82.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
82.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S090 Upper Hutt Rural Communities - Peter Jeffery Hutson

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
90.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
90.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.
90.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
90.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not	Give equal weight to all government legislation and disregard regulation by committee.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				recognised in NPS-FM. Determines that this is a case of legislation by committee.	
90.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
90.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	Defer any further action on PC1 pending gathering an effective database.
90.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
90.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
90.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
90.010	8 Whaitua Te	8.2.4 Rural land	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	use and earthworks		for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	
90.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.
90.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
90.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				and uncertainty associated with resource consent requirements	course of action which may be at variance to thee drafted regulations.

S067 Upper Hutt Rural Communities - Peter Thomson

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
67.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
67.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.
67.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
67.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was	Give equal weight to all government legislation and disregard regulation by committee.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	
67.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
67.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	Defer any further action on PC1 pending gathering an effective database.
67.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
67.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
67.009	2 Interpretation	Small stream riparian	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		programme			
67.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
67.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.
67.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
67.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S073 Upper Hutt Rural Communities - Philip Eales

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
73.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
73.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.
73.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
73.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned	Give equal weight to all government legislation and disregard regulation by committee.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	
73.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
73.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	Defer any further action on PC1 pending gathering an effective database.
73.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
73.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
73.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
73.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
73.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.
73.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river -	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
73.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S065 Upper Hutt Rural Communities - Rhiannon Jessica Forbes

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
65.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
65.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.
65.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
65.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	Give equal weight to all government legislation and disregard regulation by committee.
65.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
65.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	Defer any further action on PC1 pending gathering an effective database.
65.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
65.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
65.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
65.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
65.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
65.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
65.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S076 Upper Hutt Rural Communities - Richard Charles Bialy

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
76.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
76.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.
76.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and	Remove clauses where there is an insufficient network of water quality monitoring sites.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	
76.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	Give equal weight to all government legislation and disregard regulation by committee.
76.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
76.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	Defer any further action on PC1 pending gathering an effective database.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
76.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
76.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
76.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
76.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
76.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				measures will have substantial costs and may result in minimal water quality improvements.	
76.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
76.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S069 Upper Hutt Rural Communities - Susan Patricia Boyle

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
69.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
69.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
69.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
69.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	Give equal weight to all government legislation and disregard regulation by committee.
69.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
69.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the source of contamination is farming activities/human activity. Considers GWRC need to understand	Defer any further action on PC1 pending gathering an effective database.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	
69.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
69.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
69.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
69.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
69.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	
69.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
69.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S074 Upper Hutt Rural Communities - Teresa Eales

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
74.001	General comments	General comments - consultation	Not Stated	Concerned there was virtually no consultation completed on PC1 with those most affected. Notes the rural community heard of PC1 through word of mouth.	Withdraw PC1 and undertake further consultation
74.002	General comments	General comments - current legislation	Not Stated	Considers PC1 to be lacking supporting evidence. Considers rules and methods classifying streams, drains, ditches, and ephemeral flows as rivers in PC1 should be struck out. States these rules were developed to get around the GWRC v UHCC ruling	Remove clauses that are demonstrably regulating by fiat. Demonstrate respect for the rule of law.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
74.003	General comments	General comments - current legislation	Not Stated	Concerned that PC1 is proposing sanctions on property owners for factors that they cannot control. Considers within any catchment there are upstream and downstream properties and very few indicative monitoring sites, such as the Mangaroa and Akatarawa Valley catchments. Concerned properties will be assessed based on downstream results from a single monitoring point	Remove clauses where there is an insufficient network of water quality monitoring sites.
74.004	General comments	General comments - current legislation	Not Stated	Questions the decision to prioritise freshwater management over other National Policy Statements such as the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Urban Development. Concerned GWRC has erroneously decided to regard the Te Mana o te Wai hierarchy of obligations (a)-(c) as mutually exclusive rather than equally weighted and interdependent. Concerned the decision to give maximum weight to one piece of legislation was exacerbated by the decision to take into account the opinion of one Whaitua with regard to copper and zinc levels. Levels of copper and zinc are not recognised in NPS-FM. Determines that this is a case of legislation by committee.	Give equal weight to all government legislation and disregard regulation by committee.
74.005	General comments	General comments - overall	Not Stated	Questions whether staff have been advised of the inclusion of the statement that all rules in PC1 will have immediate legal effect as they meet the requirements of section 86B. Concerned about differing requirements for riparian margins outlined in PC1 and supporting information for PC1.	Delete the 'immediate legal effect' statement in the Section 32 report to indicate that PC1 rules will attain legal effect upon PC1 becoming fully operative.
74.006	General comments	General comments - rural	Not Stated	Considers there to be no data on water quality gathered within the Mangaroa catchment and the Akatarawa catchment. States that the headwaters of the catchments are located 20km from the monitoring points. Considers there to be a lack of understanding on how and where contaminants are entering water and that GWRC is assuming the	Defer any further action on PC1 pending gathering an effective database.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				source of contamination is farming activities/human activity. Considers GWRC need to understand where and how sediment and contaminants are entering water bodies. Recommended the Mangaroa and Akatarawa catchments, at least 3 monitoring points should be established to identify the source of any quality reduction.	
74.007	General comments	General comments - overall	Not Stated	Identifies drafting errors in PC1 that alter the intended meanings of sections and render the second paragraph meaningless.	Subject PC1 to further editing
74.008	General comments	General comments - economic cost/impact	Not Stated	Concerned the section 32 does not adequately quantify the economic, environmental, and cultural costs and benefits through an economic impact assessment.	Requests a cost- benefit exercise be completed to ensure the concept of financial accountability is followed .
74.009	2 Interpretation	Small stream riparian programme	Not Stated	Questions what the minimum width of a small streams is.	Clarify the definition of small rivers upon which other regulations rely e.g. Stock exclusion and fencing rules.
74.010	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers available data identifying the origin of contaminants in water to be insufficient. Considers for the Hutt River, indicators from primary contact sites indicate that contamination is not originating from the farming communities of Akatarawa and Mangaroa but rather downstream of Taita Gorge. States a disproportionate amount of effort has been put into trying to solve a problem that does not exist. Also states that as the farming communities of Upper Hutt have moved away from dairy farming, prior problems have been resolved.	Requests GWRC move away from attributing contamination problems to farming and re-focus on urban sources.
74.011	General comments	General comments - rural	Not Stated	Questions the justification for measures targeting Mangaroa Valley, Akatarawa Valley, and other farming communities due to a lack of supporting evidence. States that the s32 report identified that stocking rates and stock numbers are low, amounts of nitrogen fertiliser used are low, there is a low	Withdraw measures in PC1 targeted towards the Upper Hutt farming community.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				opportunity to reduce nitrogen discharges, and recommendations that gorse fixes nitrogen leaching are incorrect. Also states that there is no evidence to support statements that on-site wastewater systems can be a source of nitrogen losses. Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm. Highlights that proposed measures will have substantial costs and may result in minimal water quality improvements.	
74.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers animals, excluding cattle deer and pigs, to be exempt from Rule WH.R28.	Request confirmation that cattle, deer, and pigs are exempt from Rule WH.R28
74.013	12 Schedules	Schedule 35: Small farm registration.	Not Stated	Concerned the level of information required to register small farms is complex and farm owners may not have the expertise to produce the data required and GWRC does not have the systems to receive the data. Also concerned about the costs and uncertainty associated with resource consent requirements	Delete the requirement for farms of 4 ha to register with GWRC. Require GWRC to have the necessary systems and applications in place prior to promulgating a regulation that will not function appropriately without those systems. Confirm whether GWRC have the authority to commit to a course of action which may be at variance to thee drafted regulations.

S194 Urban Edge Planning Group on behalf of Mangaroa Farms Ltd

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S194.001	General comments	General comments - unplanned greenfield development	Neutral	Notes a Rural Lifestyle Zone is understood to be a non-urban zone, and therefore, it is concluded the framework relating to unplanned greenfield development would not be applicable to Mangaroa Farms intended future activities. However, if the framework relating to unplanned greenfield development were to impact upon these	Seeks the following: -Ensure the provisions relating to unplanned greenfield development do not relate to development occurring in the rural environment, including the Rural Lifestyle Zone. -Amend activity status of WH.R22 from prohibited to non-complying. -Any consequential changes or alternative relief required to

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				plans, it would be of significant concern to the submitter.	achieve the intended outcomes sought within this submission.
S194.002	General comments	General comments - rural	Neutral	Broadly supports framework for rural land use activities noting that it generally aligns with the regenerative farming practices undertaken and supported by submitter.	Seeks the following: -Ensure the provisions relating to unplanned greenfield development do not relate to development occurring in the rural environment, including the Rural Lifestyle Zone. -Amend activity status of WH.R22 from prohibited to non-complying. -Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.
S194.003	2 Interpretation	Unplanned greenfield development	Neutral	Neutral stance is conditional on proposed definition not applying to rural based development within a Rural Lifestyle Zone. If this interpretation is incorrect, the submitter would oppose definition and related prohibited activity framework.	Ensure definition of unplanned greenfield development does not relate to development occurring in the rural environment, including the Rural Lifestyle Zone. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.
S194.004	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Neutral	Neutral stance is conditional on proposed definition not applying to rural based development within a Rural Lifestyle Zone. If this interpretation is incorrect, the submitter would oppose definition and related prohibited activity framework.	Ensure definition of unplanned greenfield development does not relate to development occurring in the rural environment, including the Rural Lifestyle Zone. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.
S194.005	8 Whaitua Te Whanganui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from	Neutral	Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered.	Retention of notified provisions, or active involvement of submitter in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		farming activities.			
S194.006	8 Whaitua Te Whanganui-a-Tara	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Neutral	Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered.	Retention of notified provisions, or active involvement of submitter in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.
S194.007	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Neutral	Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered.	Retention of notified provisions, or active involvement of submitter in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.
S194.008	8 Whaitua Te Whanganui-a-Tara	Policy WH.P24: Phasing of farm environment plans.	Neutral	Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered.	Retention of notified provisions, or active involvement of submitter in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.
S194.009	8 Whaitua Te	Policy WH.P25: Managing	Neutral	Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly	Retention of notified provisions, or active involvement of submitter in relation to any changes that would result in a more restrictive framework in relation to rural land use

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	rural land use change.		the submitter seeks to remain involved in any process that could see these provisions altered.	activities and the associated works of Mangaroa Farms. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.
S194.010	8 Whaitua Te Whanganui-a-Tara	Policy WH.P26: Managing livestock access to small rivers.	Neutral	Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered.	Retention of notified provisions, or active involvement of submitter in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.
S194.011	8 Whaitua Te Whanganui-a-Tara	Policy WH.P27: Promoting stream shading.	Neutral	Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered.	Retention of notified provisions, or active involvement of submitter in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.
S194.012	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Neutral	Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered.	Retention of notified provisions, or active involvement of submitter in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.
S194.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Neutral	Neutral stance taken by submitter is conditional on proposed Rule WH.R13 not applying to rural based development within a Rural Lifestyle Zone. If this interpretation is incorrect, the submitter would oppose the prohibited activity rule framework.	Ensure provisions relating to unplanned greenfield development does not relate to development occurring in the rural environment, including the Rural Lifestyle Zone. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S194.014	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity.	Neutral	Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered.	Retention of notified provisions, or active involvement of submitter in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.
S194.015	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land - controlled activity.	Neutral	Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered.	Retention of notified provisions, or active involvement of submitter in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.
S194.016	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance - discretionary activity.	Neutral	Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered.	Retention of notified provisions, or active involvement of submitter in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.
S194.017	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Neutral	Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered.	Retention of notified provisions, or active involvement of submitter in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.
S194.018	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry - discretionary activity.	Neutral	Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered.	Retention of notified provisions, or active involvement of submitter in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms. Any consequential changes or alternative relief required to

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					achieve the intended outcomes sought within this submission.
S194.019	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.	Oppose	Recognises need for restrictive controls on plantation forestry in areas identified as being at the highest risk of erosion but considers the proposed prohibited activity status is overly restrictive, and seeks a non-complying activity status instead. Considers this will ensure the activity continues to be restricted within areas where effects are anticipated to be the most significant, but will provide a pathway for such effects to be appropriately considered.	Amend activity status of WHR.22 from Prohibited to Non-Complying. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.
S194.020	12 Schedules	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Neutral	Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered.	Retention of notified provisions, or active involvement of submitter in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.
S194.021	12 Schedules	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	Neutral	Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered.	Retention of notified provisions, or active involvement of submitter in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.
S194.022	12 Schedules	Schedule 36: Additional requirements for Farm Environment Plans in	Neutral	Notes any further restrictive changes to these provisions could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly the submitter seeks to remain involved in any process that could see these provisions altered.	Retention of notified provisions, or active involvement of submitter in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.			
S194.023	13 Maps	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Neutral	Neutral stance taken by submitter is conditional on the unplanned greenfield areas identified in Map 88 not applying to rural based development within a Rural Lifestyle Zone. If this interpretation is incorrect, the submitter would oppose the identified extent of unplanned greenfield areas.	Ensure the areas identified in Map 88 relating to unplanned greenfield development do not relate to development occurring in the rural environment, including the Rural Lifestyle Zone. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.

S097 Urban Edge Planning Ltd on behalf of Coronation Real Estate Ltd

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S97.001	General comments	General comments - unplanned greenfield development	Oppose	Opposes the site at 9 Comber Place as being identified as unplanned greenfield area or subject to the relevant provisions; Chapter 13- Map 87, and Chapter 8 - Policy WH.P16 and Rule WH.R13	Not stated
S97.002	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Oppose	Concerned the policy is too narrow as it does not provide a pathway or guidance other than avoidance. Questions why stormwater discharge from unplanned development differs from stormwater discharge from planned development with the underlying effects-based approach. Submitter considers the effects the same and potentially manageable (e.g. through an effects management hierarchy)	Amend policy to provide a pathway where the effects from additional stormwater discharges can be managed appropriately. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S97.003	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Opposes the prohibited activity status as it does not allow an effects assessment which means the effects are considered too significant and cannot be managed. Submitter questions how these effects can then be managed through a plan change process. Prohibited activity status does not recognise opportunities to undertake catchment-based stormwater management and environmental enhancement, particularly those already in degrading states. Considers the rule does not differentiate between the use of land and the associated stormwater discharge. Considers the prevention of increased contaminant load from new development can be managed through the RC process without needing a plan change process. Changing the status from unplanned greenfield development to planned greenfield development requires consideration for wider effects which could be considered an attempt to widen the scope and result in duplication with the District Plan change. Considers a discretionary or non-complying activity status would provide two avenues, either apply for a resource consent in the knowledge that future additions or amendments may require further consents or apply for a plan change to achieve the long-term change to the NRP that would potentially provide an easier pathway for future development. The main differences are longer time frames, wider scope and the additional further submission phase for a plan change. Considers a plan change is therefore not an efficient or effective response and a prohibited activity status is not adequately reconciled in the context of other national direction, including the NPS-UD.	Replace the prohibited activity status with a discretionary or non-complying activity status. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S97.004	13 Maps	Map 87: Unplanned greenfield areas - Wellington City Council.	Oppose	Oppose the identification of the site at 9 Comber Place, Johnsonville as an unplanned greenfield area on Map 87 due to the latest subdivision and land use consent decision report (SR515059) describing the proposed zoning of the site as an error. Due to the ongoing process delays for the PDP, this error has not been corrected yet and has subsequently been incorrectly identified on Map 87 of PC1. Considers reliance on the proposed zoning maps of the PDP for identification of unplanned greenfield areas is inappropriate given the immediate legal effect and wide-reaching consequences of this identification. This approach does not reflect the possibility and likelihood of future changes to the zones in response to submissions. It is unclear how any changes to the spatial extent of the proposed zones can be carried over into the NRP maps. Meanwhile, the impending prohibitive activity status for any future development as well as temporary discretionary activity status under s87B of the RMA creates significant risk and uncertainty for the landowner and threatens the ongoing and consented development of the site.	Amend Map 87 to show the site at 9 Comber Place, Johnsonville as Planned/Existing Urban Area.

S096 Urban Edge Planning Ltd on behalf of M & J Walsh Partnership Ltd

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S96.001	General comments	General comments - consultation	Not Stated	Concern about lack of consultation with affected landowners/developers.	Not stated
S96.002	General comments	General comments - unplanned	Oppose	Opposes the identification of parts of site 12 Shaftesbury Grove as an unplanned greenfield area and the related provisions that make unplanned greenfield development a prohibited activity.	Not Stated

		greenfield development			
S96.003	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Oppose	Considers proposed policy too narrow due to lack of pathway other than avoidance. Considers effects could be managed. Questions why stormwater discharge from unplanned development differs from stormwater discharge from planned development with the underlying effects based approach. Submitter considers the effects the same and potentially manageable (e.g. through an effects management hierarchy).	Amend policy to provide pathway where effects of additional stormwater discharged can be managed. Any further changes needed to achieve the intention of this submission.
S96.004	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Opposes prohibited activity status for unplanned greenfield development. Concerned prohibited activity status means effects cannot be assessed as the effects are considered too significant to be managed and is unclear how effects could then be managed through a plan change process: - Prohibited status does not allow for effects assessment as no application can be made under this rule. - Prohibited status fails to recognise the positive influence on catchments and stormwater management that greenfield development can have.	Replace prohibited status with discretionary or non-complying and any consequential changes to provisions in PC1.
S96.005	13 Maps	Map 89: Unplanned greenfield areas - Hutt City Council.	Oppose	Opposes the partial identification of 12 Shaftesbury Grove, Stokes Valley, as an unplanned greenfield area on Map 89 as it does not reflect the Medium Density Residential Zoning as sought by PC58 nor the development area identified on site proposed by PC58. Notes the FDS has been developed at a regional level and does not appropriately reflect development intentions at a property level. Doubts the FDS was intended to inform and guide such far reaching and fundamental regulations as proposed by PC1 in relation to unplanned greenfield development. Concerned about removal of decision making from Councils and Councillors and considers lack of consultation with Councils in the	Amend Map 89 to show the entire site at 12 Shaftesbury Grove as Planned / Existing Urban Area.

				region led to lack of consideration of less advanced District Plan reviews. Feels consideration of 12 Shaftesbury Grove as unplanned greenfield development does not reflect or align with the long established development intentions for the site, the identification of the site in HCC's Urban Growth Strategy as a potential growth area or HCC support for the site being used for urban development. The lack of identification of 12 Shaftesbury Grove does not take into consideration: - The revocation of reserve status over part of the site by Council - Sale of site to current owners based on marketing package which included indicative development schemes for up to 180 houses and several technical reports, including reports on water supply and other services - Hutt City's support for the development of site - Delays on intended rezoning due to legislation changes - acceptance of the private plan change seeking rezoning of the site	

S098 Urban Edge Planning Ltd on behalf of Pandion Limited

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S98.001	General comments	General comments - overall	Not Stated	No submission point stated	Not stated
S98.002	General comments	General comments - maps	Not Stated	No submission point stated	Not stated
S98.003	General comments	General comments - consultation	Not Stated	Concerned about the apparent lack of engagement with landowners and developers about the intended approach to greenfield development.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S98.004	General comments	General comments - unplanned greenfield development	Oppose	Opposes the proposed provisions that require the avoidance of all new stormwater discharges from unplanned greenfield development and make any use of land and associated discharge of stormwater from impervious surfaces from unplanned greenfield development a prohibited activity.	Not stated
S98.005	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Not Stated	Opposes the proposed provisions that require the avoidance of all new stormwater discharges from unplanned greenfield development and make any use of land and associated discharge of stormwater from impervious surfaces from unplanned greenfield development a prohibited activity.	Not stated
S98.006	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Not Stated	Opposes the proposed provisions that require the avoidance of all new stormwater discharges from unplanned greenfield development and make any use of land and associated discharge of stormwater from impervious surfaces from unplanned greenfield development a prohibited activity.	Not stated
S98.007	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Oppose	Concern about lack of pathway/guidance other than avoidance and that it conflicts with the NPS-UD. Questions why stormwater discharge from unplanned development differs from stormwater discharge from planned development with the underlying effects-based approach. Submitter considers the effects the same and potentially manageable (e.g. through an effects management hierarchy)	Amend the proposed policies to provide a pathway where the effects from additional stormwater discharges can be managed appropriately. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S98.008	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Oppose	Opposes the prohibited status of unplanned greenfield development. PC1 does not consider the possibility of change in use enhancing the environment and more effectively managing stormwater catchments. Key concerns included: - that prohibited activity does not allow for an effects assessment as no application can be made . - Prohibited status fails to recognise that a change in land use can positively impact stormwater management and the environment. - The rule does not differentiate between the use of land and the associated stormwater discharge. - There is limited future development available for industrial zones with no planned greenfield development for new industrial zones. - The prohibited status does not align with other national directions such as the NPS-UD. - A discretionary or non-complying activity status would provide applicants with two options - either apply for a resource consent for an unplanned greenfield development in the knowledge that future additions or amendments may require further consent or apply for a plan change to achieve the long-term change to the NRP that would provide a (potentially) easier pathway for future development. - Any plan change would require a rezoning plan change with consideration of any stormwater effects, which would need a district plan change and effects management plan, which should be sufficient. - Confusion around how the combined district and regional plan change would work. Needs further clarification.	Replace the prohibited activity status with a discretionary or non-complying activity status. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.

S187 Victoria University Canoe Club

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S187.001	General comments	General comments - water bodies	Not Stated	Submitter values the water quality values of the following areas for contact recreation and ecosystem health: i. Te Awakairangi / the Hutt River ii. Akatarawa River iii. Whakatikei River iv. Titahi Bay v. Lyall Bay vi. Otaki River Considers the natural form and character of these waterbodies is an important part of their value. Natural form and character creates rapids and other features of these sections of river that make them valuable for kayaking. Te Awakairangi / the Hutt Gorge is an outstanding run for whitewater kayaking, which traverses what they consider an outstanding landscape with outstanding amenity values. Would like to see the outstanding value of this section of river recognised in the plan. The natural and wildlife values of these areas are also important to the submitter.	Requests the outstanding value of this section [Te Awakairangi / the Hutt Gorge] of river recognised in the plan.
S187.002	General comments	General comments - water bodies	Not Stated	Concerned about increased amounts of sediment coming from the Pakuratahi River when flows increase and potential e.coli and pathogen loads in the water. Observes algae in summer months when flows are low resulting in issues with recreation and amenity as well as human health when making contact with water.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Concerns river engineering such as railway iron degrades water quality and creates potential hazards for river users when slash and logs get caught on structures	
S187.003	General comments	General comments - overall	Support	Supports PC1 and the initiatives to improve water quality in the catchment.	Requests that GWRC initiatives are carried through to the operative plan, particularly where they protect and restore ecosystem health, contact recreation values, natural form and character, and amenity.
S187.004	General comments	General comments - water bodies	Support	Supports the concept of Te Mana o te Wai and the hierarchy of obligations.	Acknowledge Te Mana o te Wai (and wai ora) throughout PC1 and prioritise ecosystem health and contact recreation.
S187.005	General comments	General comments - water bodies	Not Stated	Key concerns are water quality (particularly e. coli, sediment, algal growth/periphyton, and ecosystem health); amenity; contact recreation; and natural form and character.	Seeks the following: Recognition in the plan of the outstanding kayaking/packrafting /rafting values in the Whaitua are recognised in the plan, particularly for the Hutt Gorge (which has outstanding kayaking, amenity, and landscape values). More work by GWRC to monitor and preserve natural character, and to strengthen objectives, policies, and rules which allow the river to function more naturally, particularly in its reaches influenced by flood protection. Targets for natural character that are similar to the sorts of targets set for water quality and seeks objectives and policies that support these. More work to enhance water quality in the coastal environment, for use of 'flat water' environments to learn and train without worrying about compromising health if contact is made with the water. Retain coastal water quality indicators/targets.
S187.006	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Amend	Supports the targets in the water quality target tables, but seeks stronger periphyton targets as submitter considers 200 mg is too high to protect the values in these catchments.	Amend minimum periphyton target to be 120 mg (e.g., for the Waiwhetu and for the lower mainstem of Te Awa Kairangi) Amend to a maximum DIN target of < 1.0 mg/L, and ideally targets of around 0.3 mg/L

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Seeks as much done as possible through environmental limits to achieve these targets.	

S193 Wairarapa Federated Farmers

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S193.001	General comments	General comments - overall	Support	Generally agrees with the long-term overarching objectives for both whaitua. Considers 2100 is a realistic timeframe for those objectives, as many of the target attribute states (TASs) will take multiple generations and much planning and investment to achieve	Not Stated
S193.002	General comments	General comments - overall	Not Stated	Considers quality data is needed to inform models that are free of uncertainty and error to the extent that they can be used to underpin policies that drive system change. Concerned that model outputs used for PC1 are inadequate for this purpose. Considers insufficient effort was put into ground-truthing the modelled data for PC1, and this should be a focus for the Council before some policies and rules can be proposed.	Not Stated
S193.003	General comments	General comments - rural	Not Stated	Concerned to see 'blanket' policies and rules proposed that will be implemented at property level with severe implications for rural landowners, including requiring them to retire certain classes of land from pastoral and plantation forestry use and undertake expensive riparian management measures. Considers there is insufficient evidence supporting these policies and rules, and the proposed policies and rules will not get us any closer to achieving the TASs.	Not Stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S193.004	General comments	General comments - economic cost/impact	Not Stated	Considers the direct and opportunity costs of the proposed policies and rules are too high for rural landowners and amount to a form of 'managed retreat' for public good, with no compensation.	Not Stated
S193.005	General comments	General comments - overall	Not Stated	Considers the Council could be an "exemplar" on its own land in partnering with landowners and rural communities to get the smart data needed to inform cost-effective policies that will achieve its long-term objectives.	Not Stated
S193.006	General comments	General comments - fresh water	Not Stated	Supports an integrated catchment approach to the management of sediment and nutrient loss, supported by the Council and underpinned by non-regulatory methods such as FAPs and Regional Forest Spatial Plan. Considers this approach allows the Council to demonstrate best practice regarding the management and protection of natural ecosystems including freshwater ecosystems.	Not Stated
S193.007	General comments	General comments - target attribute states	Not Stated	Supports progressive improvement towards the health and well-being of waterbodies in Te Awarua-o-Porirua Whaitua and Whaitua Te Whanganui-a-Tara (the whaitua). Generally agrees with the overarching objectives in chapters 8 (WH.O1) and 9 (P.01) but seeks a provision for a thriving primary production sector. Considers Objectives WH.02 and P.02 clearly outline a trajectory of measurable improvement towards the health and well-being of waterbodies and their margins in the whaitua so by 2040 listed processes or states have improved or have been reached. Considers these objectives recognise the system change needed to meet the overarching objectives of WH.01 and P.01 will take time, knowledge, and significant financial investment to	Seeks the reference to 2040 be removed from Tables 8.4 and 9.2. Seeks TASs and/or sites where there is limited or 'insufficient data' be removed from Tables 8.4 and 9.2. Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				achieve. Supports an interim timeframe of 2040 to 'check in' and see whether water quality is improving. Does not consider all TASs will be achievable by 2040 partly because there is a lack of quality data to establish baseline positions for all TASs. Suggests more work needs to be done to gather and collate this data so it can be used to inform the freshwater action plans (FAPs) that will set out the pathway to achieving the TASs. Considers 2040 is an unrealistic timeframe to meet all the proposed TASs set out in Tables 8.4 and 9.2 of PC1. Considers the notes in Tables 8.4 and 9.2 indicate the Council has insufficient data on baseline states for some attributes and further monitoring and modelling is required to develop attribute state frameworks. Considers further work is required by the Council, with mana whenua and communities, to develop and implement FAPs to address how TASs will be achieved. Notes it will take time to establish a robust body of evidence for the TAS baselines, and the plans on how to achieve TASs where they need to be improved. Considers the TASs met should be maintained. Where they need to be improved, the tables should reflect realistic dates by which the TASs can be achieved Considers milestone target dates do not have to be the same for all TASs and all part FMUs. Suggests prioritising part-FMUs where the Council can achieve 'easy-wins' or where human health is most likely to be impacted by poor water quality.	

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers realistic timeframes can be determined when preparing FAPs and carried into the NRP through a variation. Seeks relief that TASs and/or sites where there is limited or 'insufficient data' should be removed from Tables 8.4 and 9.2 as the baseline state cannot be reliably determined, and therefore it is not known whether the attribute and/or site needs to be maintained or improved.	
S193.008	General comments	General comments - earthworks	Oppose	Considers the operative NRP earthworks and vegetation clearance rules should remain so the changes are given time to take effect. Considers the rules were a significant shift on the previous plan and it is too soon to unravel the positions discussed and agreed upon through Environment Court-assisted mediation. Opposes removing the permitted and controlled activity rules (Rule R102 and Rule R103) for the construction of new farm tracks. Questions why Rules R102 and R103 have been removed as the conditions for both rules were prescriptive in terms of managing environmental effects. Concerned farm track works that cannot meet the proposed permitted activity rule will now require consent for a restricted discretionary or non-complying activity. Notes earthworks in winter, unless anticipated in a certified farm environment plan (FEP), now require consent for a non-complying activity irrespective of whether the effects of the earthworks can be managed to meet the discharge standards. Concerned to see the implementation of a 'blanket ban' on earthworks for four months of the year as it reduces a farmer's ability to manage and operate their business without additional cost and administrative burden and respond to events in a	Seeks to have Rules R102 and R103 reinstated. Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				timely manner. Notes Farmers need the flexibility to be able to restore access if tracks are washed out without having to wait for resource consent to be granted. Opposes the earthworks and vegetation clearance policies and rules in the proposed NRP and seeks relief that the policies and rules in the operative NRP remain.	
S193.009	General comments	General comments - rural	Oppose	Concerned about the erosion risk land modelling and how the Council intends to use it to underpin policies to retire land from pasture and plantation forest. Agrees with Easton et al that site-specific assessments must be undertaken to ground-truth the model. Considers the policy requiring the establishment of permanent woody vegetation cover on at least 50% of highest erosion land (pasture) within 10 years and 100% by 2040 to be overly onerous to landowners and impractical to implement. Considers this a policy of managed retreat to attain a public good and is an intrusion into private property rights. Considers the policy creates an equity issue, as proposed policies and rules in urban areas of the whaitua generally apply at a municipal level (they don't directly impact individual households or businesses), and costs can be debt funded across multiple generations of ratepayers. In comparison, policies and rules proposed for rural areas of the whaitua impact individual landowners with considerable costs being incurred within the next 17 years. Consider the policy may be palatable if the timeframes were extended to a reasonable period	Not Stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				and landowners, in a voluntary capacity, could receive full compensation for areas of their land that would no longer be available for farming. Concerned the adoption of this policy will affect the on-farm income of landowners as it reduces options for economic use for landowners and will likely impact property values, making it harder for these properties to be sold and reducing their sale price. Submitter references Evans et al who argue that a change in government policy that denies property owners the ability to make an economically viable use of that property in the use for which it was purchased represents a de-facto taking that requires compensation. Concerned the cost of fencing, pre-planting preparation of land, purchase of seedstock, planting, watering, fertilising and weed and pest control will be picked up by farmers. Identifies there will be challenges sourcing sufficient seedstock for planting, finding labour to plant native seedstock and sourcing and paying for specialist advice to ensure new plantings occur in a way that is consistent with the Emissions Trading Scheme (ETS) eligibility criteria so as to avoid plantings being ineligible for New Zealand Units (NZUs). Notes the policy vaguely mentions that WRC will provide 'support' to landowners and if this support will be comprehensive it is likely to be costly for ratepayers. Considers the support of landowners (i.e. financial compensation for the loss of production, the costs associated with planting land in permanent forest, and ongoing maintenance of those areas) is of such importance that a policy is required that is explicit in the extent, timing and delivery of such assistance and includes a full buy-out option.	

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers the statement in the s32 report that the separation of highest erosion risk land and soil conservation treatment of high erosion risk land may provide for minor increases in farm productivity has no rational basis and ignores the Council's other policies which cap nutrient discharges from farming activities, effectively limiting further intensification. Considers the area (ha) of land within the highest erosion risk land map at a farm scale is significant for some properties. Some members estimate they could lose a third of their property under this policy.	
S193.010	General comments	General comments - rural	Oppose	Opposes policies and rules that require the 'blanket' mandatory retirement of private land to manage potential sediment loss. Suggests non-regulatory incentives and support should be used to achieve the restoration and enhancement of the natural ecosystems as discussed in Hearing Stream 3 for the RPS. References comments in the s42A report that regional plans cannot require landowners or others to plant forest or restore and extend wetlands, the recommended amendment to Method CC.4 to use a partnership approach, with mana whenua and other key stakeholders, and specific recommendations in relation to the Regional Forest Spatial Plan. Supports an integrated catchment approach to the management of sediment loss, supported by the Council and underpinned by non-regulatory methods such as FAPs and Regional Forest Spatial Plans. Considers this approach provides an opportunity for the Council to demonstrate best practice regarding the management and protection of natural ecosystems including freshwater	Not Stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				ecosystems. Suggests Council can use their own farmland as an exemplar to communities and develop, in partnership with private landowners, innovative solutions to targeted at-risk areas.	
S193.011	General comments	General comments - rural	Oppose	Concerned about the dSedNet modelling to estimate the sediment load reductions required from catchments to meet the TASs for visual clarity. Considers there is too much uncertainty and error for the model output to be used as a basis for policy decisions that will impact farming businesses. References Greer et al 2023 to support concerns regarding the limitation of modelling and data collected. Considers the sediment load reduction modelling relies on data that is spatially and temporally limited. In particular, water quality monitoring sites were noted as being limited. Notes that the proportional change in sediment load required to meet visual clarity targets in Te Awarua-o-Porirua was estimated using data from three sites. States that one monitoring site can not yield data that is representative of all water bodies in a catchment. For example, the Mākara Stream at Kennels monitoring site is used to determine water quality for 7203 ha and Mangaroa River at Te Marua is used to determine water quality for 10,370 ha. Notes the 'MFE Guidance for Implementing the NPS-FM Sediment Requirements' comments that within the modelling process, a small error in input data can result in a substantial error in outputs and that there are errors in load estimations from monitored water quality and flow data particularly, when it's restricted to monthly grab samples. Notes that MFE's advice is to improve the current level of	Requests council improves the quality and quantity of their monitoring data to inform the dSedNet modelling before any changes to policies and rules in the NRP are made.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				sediment monitoring and to collect flow data concurrently at sediment monitoring sites. Also cites Whaitua-Te-Whanganui-a-Tara-Water-Quality-and-Ecology-Scenario-Assessment a 2020 by Aquanet which was part of the information considered by the Te Awarua-o-Porirua whaitua committee and the uncertainties in the information available. Notes that clause 1.6(2)(b) of the NPS-FM requires councils to take all practicable steps to reduce uncertainty and clause 1.6(1) requires councils to use, if practicable, complete and scientifically robust data. Concerned the data used to model the sediment load reductions is neither complete nor scientifically robust and is inadequate to underpin significant shifts in policy that have severe consequences for rural landowners. References the Whaitua-Te-Whanganui-a-Tara-Water-Quality-and-Ecology-Scenario-Assessment as evidence of the uncertainties in the information available on the effectiveness of erosion control measures to reduce sediment loads and modelling of this completed. Contends that the data used to model the sediment load reductions is neither complete nor scientifically robust (contrary to clauses 1.6(1) and 1.6(2)(b) of the NPS-FM) and is inadequate to underpin significant policy shifts that have severe consequences for rural landowners.	
S193.012	General comments	General comments - plantation forestry	Amend	Considers Policy WH.P28 and Rule WH.R22 (requiring plantation forestry is not established or continued beyond the harvest of existing plantation forests on highest erosion risk land) to be a draconian approach that ignores technological advances forestry harvesters have made to harvest	Amend policy to enable the replanting of production forests so long as landowners can identify (through a consent application) how the management and harvest of the forest will be achieved without adverse effects on sediment in water bodies.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				practices. Considers the policy an example of managed retreat' for the public good, with all the cost borne by the landowner. Identifies there will be challenges sourcing sufficient seed stock for planting, finding labour to plant native seed stock and sourcing, and paying for specialist advice to ensure new plantings occur in a way that is consistent with the Emissions Trading Scheme (ETS) eligibility criteria to avoid plantings being ineligible for New Zealand Units (NZUs). Considers the conversion of exotic forest to permanent forest presents several difficulties about the ETS as outlined below: Uncertainty around how the ETS treats the transition of registered exotic forests to native forest species, Uncertainty around how averaging accounting would address a new planting rotation occurring on a very different basis to when the forested area was originally registered in the ETS Uncertainty around the sequestration rates of native species (this work is still in its infancy and may need 5-6 more years to produce anything of any use) Uncertainty around the possibility of needing to first de-register the exotic forest (and paying back all the NZUs earned from it) before registering the native forest as a new forest. Request this policy be amended to enable the replanting of production forests so long as landowners can identify (through a consent application) how the management and harvest of	Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				the forest will be achieved without adverse effects on sediment in water bodies.	
S193.013	General comments	General comments - fresh water	Amend	Supportive of efforts to promote the progressive shading of streams, providing landowners are supported with financial assistance to fence, plant, and maintain plantings and the width of the plantings is reasonable. Suggests stream shading may not assist the Council in meeting proposed TASs because shade from dense planting can cause the loss of undergrowth and bank-armouring vegetation, such as grasses, leading to a transient phase of increased bank erosion in small streams as the stream channel widens. The loss of undergrowth can also lead to sheetwash and rolling, which can further increase sediment loads (MFE Guidance for implementing the NPS-FM sediment requirements). Sediment-related water quality following riparian planting is likely to get worse before it gets better as stream banks erode and channels widen in response to increased tree shade (cites Rob Davies-Colley & Andrew Hughes (2020): Sediment-related water). Considers it's not practical or feasible to plant every stream, river, lake, wetland and spring margin. Considers whilst stock exclusion from small streams (<1m) within the Mangaroa River and Mākara Stream catchments can make a contribution to addressing water quality issues there is little research on riparian management measures to reduce stream bank erosion. Cites Hugh (2016) which states that a one-size-fits-all approach to riparian management measures to reduce stream bank erosion is unlikely to be appropriate or effective. Considers this knowledge should be	Undertake further monitoring to understand periphyton growth characteristics in the region.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				considered in FAPs to address interim and long-term priorities, including attaining the national bottom lines for TASs, and what can be achieved by interventionist policies. Notes the s32 report links stream shading policies to the management of periphyton growth. Considers in nearly all part FMUs the Council has insufficient data on periphyton biomass. Suggests the Council undertake further monitoring to understand periphyton growth characteristics in the region. Supports the Council's intention to address periphyton growth in specific 'hot spots' through FAPs.	
S193.014	6 Other methods	Method M42: Small farm property registration within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Oppose	Opposes Method M42 as there is no sound evidence that there is any issue with nutrient losses from small farms, or that the recommended policies and rules are necessary. Considers registration requirements and assessments of N loss will create an administrative burden for small property holders and the Council. Considers any consent requirements resulting from a failure to comply with assessment requirement will have associated costs for landowners and burden for the Council, for little or no environmental benefit. Notes the quality of data from the annual assessments may be low, and have limited use, without a full range of relevant input data and interpretation. Considers N loss management to be unnecessary as nitrogen is not a significant problem in the region's freshwater bodies. Notes the Council's own attribute state baselines show that river and stream surface water bodies are almost all within the NOF 'A' Band for nitrate and ammonia toxicity under the NPS-FM with a small number of sites in the 'B'	Delete

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Band and lakes in the 'B' and 'C' Bands. States there are no freshwater bodies in rural areas with attribute states in the 'D' or 'E' Bands for nitrogen-related attributes. Opposes the requirement for all small farms between 4ha and 20 ha to register with the Council, and to prepare an annual nitrogen risk loss assessment. Considers these requirements provide no environmental benefit, are an unnecessary burden for small block owners, and provide little or no meaningful data for the Council.	
S193.015	General comments	General comments - rural	Amend	Considers the generally low N concentrations throughout the rural areas of the two whaitua are partly due to the type of farming completed in the catchments (mixed sheep and beef farms that are not intensively farmed). Considers these properties typically have a lower N footprint than other types of farming and the risk of dissolved inorganic nitrogen (DIN) polluting waterways is very low. Notes the s32 report articulates that hill country farms in the two whaitua apply little if any nitrogen and overall, stocking rates are very low. Questions why the proposed policies are to manage N loss reductions by land retirement and destocking (as a response to the need to reduce sediment loss), even though monitoring shows that river and stream surface water bodies are almost all within the NOF 'A' Band for nitrate toxicity and ammonia toxicity.	Not Stated
S193.016	General comments	General comments - water bodies	Amend	Considers Council has limited information on what proportion of water abstraction is taken under the current permitted activity rules or is authorised under s14(3)(b) of the RMA. Supports the recommendation of Thompson in the Water quantity and allocation technical report that periodic surveys be conducted to gather more information on these	Not Stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				takes as and when required (for example, to coincide with catchment-wide expiry of consented takes). Considers this is a more pragmatic approach than requiring metering for every permitted water take, which would be unduly costly for water users to implement and for the Council to administer.	
S193.017	General comments	General comments - water bodies	Oppose	In the Porirua, Pāuatahanui, and Horokiri catchment management units, the submitter supports expressing the allocation limits and minimum flows as specific numbers rather than default percentages of mean annual low flow (MALF). Considers this change makes it clearer for water users and Council staff what the limits are. Considers in the Porirua, Pāuatahanui, and Horokiri catchment management units, water takes that meet minimum flow requirements and are within allocation limits should be assessed under a Controlled Activity rule rather than a Restricted Discretionary rule. Considers this will provide more certainty for water users and would be less expensive for the Council to administer. Supports the recommendation of the whaitua committee that the 90 + 30 freshwater management framework would protect ecosystem health whilst providing for the needs of the community.	That the allocation limit for freshwater bodies in Te Awarua-o-Porirua Whaitua be returned to 30% of MALF. Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.018	General comments	General comments - fresh water	Amend	Supports the development and use of Freshwater Action Plans in principle. Acknowledges the importance of the Council's partnership with mana whenua/tangata whenua but considers the involvement of communities, stakeholders and territorial authorities is also important in the development of FAPs and this is recognised in the NPS-FM. References the reporting officer recommendations in PC1 of the	That urban FAPs are completed by the end of 2026 and rural FAPs be completed by the end of 2027. Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				RPS Hearing Stream 5 (Freshwater) to amend Method FW1 of the RPS to include engagement with communities, stakeholders and territorial authorities in the development of FAPs. The submitter supported this recommendation and considers the RPS wording should align with the wording in Methods M36-41 of the proposed NRP. Considers the involvement of communities, stakeholders, and territorial authorities in the development of FAPs is important as the s32 report acknowledges that achieving 12 of the 321 TASs across the two whaitua will require actions in addition to those currently contemplated and that the nature and scale of these additional methods will be determined through the action planning processes after the plan-making process has been completed. Notes there are 72 triggers for FAPs across both whaitua and addressing these through FAPs will be a lot of work for the Council, mana whenua and communities. Submitter seeks relief that the urban FAPs be completed by the end of 2026 and that rural FAPs be completed by the end of 2027. Considers the FAPs should be targeted to catchment-scale actions. Concerned that the boundaries for the part-FMUs may need refining for the purposes of managing water quality in both rivers and receiving environments (e.g. harbours). For example, the submitter understands that some part-FMUs have catchments that drain in different directions..	
S193.019	General comments	General comments - rural	Not Stated	Concerned the term FEP is being used interchangeably with the nationally mandated FWFP. Recommends references to FEPs in the proposed NRP are amended to FWFPs for	Remove Tables 8.6 and 9.5 from the proposed NRP. Amend the timing for the nationally mandated FWFPs to be as determined in the national roll-out timeline.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				consistency, and to avoid 'double-up' (two separate plans being required for the one property) and confusion. Supports the use of FWFPs to identify and manage on-farm risk to freshwater contamination Opposes the dates for FEPs in Tables 8.6 and 9.5 for the following reasons: a. FWFPs are not required to be prepared by these dates as part of the national roll-out. Doubts the dates will be achievable. b. The highest priority for freshwater improvement should be urban catchments with a specific focus on improving E. coli.	Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.020	2 Interpretation	Core allocation	Amend	Submitter references their general comments on water allocation (consented takes)	Retain clause a; amend clause b iii to read **30%;** and consequential change to b ii Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.021	2 Interpretation	Earthworks	Oppose	Does not agree it is effective or efficient to propose different definitions for different whaitua. Suggests the operative definition agreed upon during pNRP Environment Court mediation and should be retained	Retain operative definition for all whaitua Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.022	2 Interpretation	Highest erosion risk land (plantation forestry)	Oppose	Considers the methodology is not fit for purpose	Delete definition Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.023	2 Interpretation	Highest erosion risk land (pasture)	Oppose	Considers the methodology is not fit for purpose	Delete definition Make any consequential amendment(s) necessary to give effect to the relief sought.

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S193.024	2 Interpretation	High erosion risk land (pasture)	Oppose	Considers the methodology is not fit for purpose	Delete definition Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.025	2 Interpretation	Highest erosion risk land (woody vegetation)	Not Stated	Considers the methodology is not fit for purpose	Delete definition Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.026	2 Interpretation	Stabilisation	Oppose	Suggests retaining the operative definitions for improved efficiency	Delete definition Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.027	2 Interpretation	Stocking rate	Amend	Considered to be consistent with farm practice	Amend 'highest at any time' to read 'average' Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.028	2 Interpretation	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)	Oppose	Considers the operative definition agreed upon during the pNRP Environment Court mediation should be retained	Retain operative definition Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.029	3 Objectives	Objective O2	Not Stated	Considers Objective O2 is relevant to all whaitua	Retain for all whaitua Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.030	3 Objectives	Objective O5	Not Stated	Considers Objective O5 is relevant to all whaitua	Retain for all whaitua Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S193.031	3 Objectives	Objective O6	Not Stated	Considers Objective O6 is relevant to all whaitua	Retain for all whaitua Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.032	3 Objectives	Objective O35	Not Stated	Considers Objective O35 is relevant to all whaitua	Retain for all whaitua Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.033	4 Policies	Policy P70: Minimising effects of rural land use activities.	Not Stated	Considers Policy P70 is relevant to all whaitua	Retain for all whaitua Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.034	4 Policies	Policy P74: Avoiding an increase in adverse effects of rural land use activities and associated diffuse discharges of contaminants.	Not Stated	Considers Policy P74 is relevant to all whaitua	Retain for all whaitua Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.035	4 Policies	Policy P77: Improving water quality for contact	Not Stated	Considers Policy P77 re priorities is relevant for all whaitua.	Retain for all whaitua Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		recreation and Māori customary use.			
S193.036	4 Policies	Policy P118: Water takes at minimum flows and minimum water levels.	Not Stated	Considers Policy P118 is relevant to all whaitua	Retain for all whaitua Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.037	4 Policies	Policy P121: Core allocation for rivers.	Not Stated	Considers Policy P121 is relevant to all whaitua	Retain for all whaitua Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.038	5.2 and 5.3 Discharges to land and water and land use rules	Rule R48: Stormwater from an individual property - permitted activity.	Not Stated	Considers Rule R48 is relevant to all whaitua	Retain for all whaitua Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.039	5.2 and 5.3 Discharges to land and water and land use rules	Rule R101: Earthworks - permitted activity.	Oppose	Considers operative rule agreed in pNRP Environment Court mediation and should be retained	Retain operative rule for all whaitua Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.040	5.2 and 5.3 Discharges to land and water	Rule R102: Construction of a new farm track -	Oppose	Considers operative rule agreed in pNRP Environment Court mediation and should be retained	Retain operative rule for all whaitua Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	and land use rules	permitted activity.			
S193.041	5.2 and 5.3 Discharges to land and water and land use rules	Rule R103: Construction of a new farm track - controlled activity.	Oppose	Considers operative rule agreed in pNRP Environment Court mediation and should be retained	Retain operative rule for all whaitua Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.042	5.2 and 5.3 Discharges to land and water and land use rules	Rule R104: Vegetation clearance on erosion prone land - permitted activity.	Oppose	Considers operative rule agreed in pNRP Environment Court mediation and should be retained	Retain operative rule for all whaitua Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.043	5.2 and 5.3 Discharges to land and water and land use rules	Rule R105: Vegetation clearance on erosion prone land in accordance with a Freshwater Farm Plan - permitted activity.	Oppose	Considers operative rule agreed in pNRP Environment Court mediation and should be retained	Retain operative rule for all whaitua Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.044	5.2 and 5.3 Discharges to land and water	Rule R107: Earthworks and vegetation clearance	Oppose	Considers operative rule agreed in pNRP Environment Court mediation and should be retained	Retain operative rule for all whaitua Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	and land use rules	- discretionary activity.			
S193.045	5.4 Beds of lakes and rivers	Rule R128: New structures - permitted activity.	Amend	Amend for clarity and certainty as per pNRP mediated agreement	Amend as follows: Retain "except a structure permitted by rules R125, R126 and R127" Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.046	5.4 Beds of lakes and rivers	Rule R133: Gravel extraction for flood protection purposes or erosion mitigation inside sites of significance - discretionary activity.	Amend	Considers effects can be managed through conditions on a controlled activity	Provide for gravel extraction in Schedule F1 rivers as a controlled activity Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.047	5.5 Water allocation rules	Rule R152: Take and use of water - permitted activity.	Oppose	Considers insufficient evidence was presented	Retain in Porirua Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.048	5.5 Water allocation rules	Rule R157: Take and use of water - controlled activity.	Oppose	Considers insufficient evidence was presented	Retain in Porirua Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S193.049	6 Other methods	Method M36: Freshwater Action Plan programme.	Amend	Amend for consistency with NPS-FM. Considers timeframes are too ambitious to complete all by December 2027	Amend clause a) to state the following: **tangata whenua, and through engagement with communities, stakeholder and territorial authorities** Amend clause b) to provide for urban FMUs by December 2026 and rural FMUs by December 2028. Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.050	6 Other methods	Method M37: Freshwater Action Plan for the Parangarahu Lakes.	Amend	Amend for consistency with NPS-FM.	Provide for engagement with communities, stakeholders and Tas
S193.051	6 Other methods	Method M38: Freshwater Action Plan for the Rangituhi catchment.	Amend	Amend for consistency with NPS-FM.	Provide for engagement with communities, stakeholders and TAs
S193.052	6 Other methods	Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua	Amend	Amend for consistency with NPS-FM.	Provide for engagement with communities, stakeholders and TAs

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.			
S193.053	6 Other methods	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	Amend for consistency with NPS-FM.	Provide for engagement with community and landowners
S193.054	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Amend	References general comments on sediment and farming. Seeks a more pro-active and evidence based catchment approach for making progress.	Delete proposed text and add text directing Council to work in partnership with primary sector organisations and landowners to support an integrated catchment management approach including collection of baseline biophysical and ecological data at catchment scale, development of Freshwater Action Plans at catchment scale, preparation of Catchment Context, Challenges and Risks documents as set out in the national Freshwater Farm Plan Regulations, and directing Council assistance with riparian planting, erosion and sediment control for 100% of farms in rural catchments by x date, eg, 2030 (similar to that provided for in NRP Method M12) Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.055	6 Other methods	Method M45:	Amend	References general comments on sediment from pastoral farming.	Amend to direct Council to identify additional sources of funding for erosion/sediment controls and riparian

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Funding of wastewater and stormwater network upgrades			management in rural areas to support achievement of TAS, including funding to provide for voluntary buyout of land; and/or insert a new policy directing Council to this effect. Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.056	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is waiora by 2100.	Amend	Amend for improved consistency with providing for all values as set out in the NPS-FM and WIPs; and amend for practical achievability	Amend to provide for a thriving primary production sector as part of the longterm vision Delete clause directing "all freshwater bodies have planted margins". Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.057	8 Whaitua Te Whanganui-a-Tara	Objective WH.O2: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural	Amend	Amend to: Refer general comments on Target attribute states and timeframes	Amend to delete "by 2040" and provide for timeframes for achievement of TAS to be developed through the Freshwater Action Plan process and incorporated in a future variation Delete clauses a) to h) or alternatively, amend b) to delete "to a more natural state"; Amend g) to add at priority primary contact recreation sites; Add clause to provide for reliable water to support a thriving primary production sector

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		wetlands and their margins are on a trajectory of measurable improvement towards wai ora.			Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.058	8 Whaitua Te Whanganui-a-Tara	Objective WH.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved to achieve the coastal water objectives set out in Table 8.1.	Amend	Re-word as follows: Amend for consistency with WH.O8	Amend chapeau to read the health and wellbeing of coastal water quality etc **are at least** maintained or improved **where TAS are not met and** by 2040...; delete e)-h) Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.059	8 Whaitua Te	Table 8.1 Coastal	Amend	Amend to be consistent with the NPS-FM	Add column for measured baseline state Amend numeric targets to read 'maintain or improve';

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	Whanganui-a-Tara	water objectives.			Delete timeframe Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.060	8 Whaitua Te Whanganui-a-Tara	Objective WH.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status.	Amend	Considers threat classification relies on factors outside the scope of this objective.	Delete "improving their threat classification" Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.061	8 Whaitua Te	Objective WH.O5: By 2040	Amend	Amend for consistency with WH O8; and with NPS-FM 1.6 (2b) direction to take all practicable steps to reduce uncertainty.	Edits to formatting needed as follows: Amend a) to read **"improve where TAS are not met"** (delete "to achieve");

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	the health and wellbeing of the Parangarahu Lakes and associated natural wetlands are on a trajectory of improvement towards wai ora.			Delete clauses b)-d); Add clause directing collection of robust data for assigning baseline state Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.062	8 Whaitua Te Whanganui-a-Tara	Table 8.2 Target attribute states for lakes.	Amend	References general comments provided References general comments provided regarding Target attribute states and timeframes.	Delete timeframe Delete attributes based on unknown or limited data Add direction to collect robust data for assignment of baseline state Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.063	8 Whaitua Te Whanganui-a-Tara	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	Amend	Amend to provide for NPS-FM and WIP values.	Amend d) to provide for sufficient reliability for the needs of communities and a thriving primary production sector. Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.064	8 Whaitua Te Whanganui-a-Tara	Objective WH.O8: Primary contact	Support	Supports prioritising primary contact sites for improvement.	Add clause directing collection of robust data for sites with insufficient information.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		sites within Te Awa Kairangi/Hutt River, Pākuratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact.			Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.065	8 Whaitua Te Whanganui-a-Tara	Objective WH.O9: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Amend	References comments provided regarding Target attribute states and timeframes.	Edits to formatting required as follows: Amend a) to read **improve where the TAS is not met** (delete 'is met'); Delete b) and c) Add clause directing collection of robust data for assessing baseline state and monitoring progress in all rivers within the part FMUs and for other rivers/catchments within the part-FMUs Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.066	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Amend	Considers there are too many gaps and uncertainties for Table 8.4 to be relied on in its current form.	Delete timeframes Delete sites/attributes where baseline state is based on limited data or further monitoring is needed; Delete columns titled part FMU default TAS; Amend NOF attributes to use NOF compliant metrics and

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					statistics Amend baseline state for the monitored sites to use the latest Council data (eg. from the 2021/22 River Water Quality and Ecology Monitoring report) Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.067	8 Whaitua Te Whanganui-a-Tara	Policy WH.P1: Improvement of aquatic ecosystem health.	Amend	For consistency with WIP recommendations for a more strategic and prioritised approach	Add new clause **aa) directing improved understanding of key contaminant sources, their connection to waterways and spatial/temporal patterns, and identification of a prioritised programme** Amend a) to add **'progressively reducing in priority catchments/locations'.** Amend b) to read **'progressively restoring habitats in priority locations'.** Add new clause **e) to provide for Council to enter into voluntary buy-out of sites/land where significant changes in land use activities may be required** Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.068	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	Consistent with WIP recommendations to provide incentives to assist implementation of existing national and regional regulations; and consistent with NRP Method M12	Amend e) to read **promote and support riparian fencing and planting** (delete proposed text); Amend f) to read **promote and support erosion and sediment control** (delete proposed text); Delete g) and h) Make any consequential amendment(s) necessary to give effect to the relief sought.

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S193.069	8 Whaitua Te Whanganui-a-Tara	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Amend	For consistency with the NPS-FM; and for an achievable work programme	Delete "all" to read **"urban" FAPs to be completed by December 2026,** and **"rural" FAPs to be completed by December 2027;** Add direction to identify appropriate and prioritised timeframes for TAS (for incorporation in a future variation). Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.070	8 Whaitua Te Whanganui-a-Tara	Policy WH.P4: Achievement of the visual clarity target attribute states.	Amend	Considers there is insufficient evidence to support the proposed reductions	Amend to delete a) and b) Add clause directing sediment source studies to establish fit for purpose information on relative sources and spatial-temporal patterns including consideration of natural factors impacting clarity (eg. Mangaroa/peat, Pauhatanui/soft-bottom substrate) and to help identify and prioritise catchments/actions. Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.071	8 Whaitua Te Whanganui-a-Tara	Table 8.5: Sediment load reductions required to achieve the visual clarity target attribute states.	Oppose	Certain of the national bottom lines are aspirational, including for Makara and Mangaroa; and baseline sediment loads are uncertain	Delete Table 8.5 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.072	8 Whaitua Te Whanganui-a-Tara	Policy WH.P5: Localised adverse effects of	Amend	Amend for improved clarity	Amend chapeau to read **"including by avoiding or minimising"** Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		point source discharge.			
S193.073	8 Whaitua Te Whanganui-a-Tara	Policy WH.P6: Cumulative adverse effects of point source discharges.	Amend	Amend to be consistent with WFF relief on objectives	Amend chapeau to read **avoided or minimised;** Amend part FMU to read **"monitored rivers"** Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.074	8 Whaitua Te Whanganui-a-Tara	Policy WH.P7: Discharges to groundwater.	Amend	Considers NRP PC1 does not provide evidence of degraded groundwater	Minor edits as follows: Amend to delete the reference to "existing discharges ..." and insert a requirement for investigation and groundtruthing of degraded groundwater Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.075	8 Whaitua Te Whanganui-a-Tara	Policy WH.P8: Avoiding discharges of specific products and waste.	Amend	Amend for consistency with c) and d)	Amend b) to read **untreated human or animal effluent** (delete proposed text) Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.076	8 Whaitua Te Whanganui-a-Tara	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal	Amend	Amend for consistency with intent	Amend chapeau to read stormwater **network** discharges Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		water objectives.			
S193.077	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	Amend	Amend for consistency with intent	Amend chapeau to read stormwater **network** discharges Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.078	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Amend for improved clarity	Amend chapeau to read new **urban** greenfield development Make any consequential amendment(s) necessary to give effect to the relief sought
S193.079	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Amend	Amend for clarity	Amend chapeau to read new **urban** greenfield development. Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.080	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges	Amend	Amend for clarity	Amend chapeau to read unplanned new **urban** greenfield development. Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		from new unplanned greenfield development.			
S193.081	8 Whaitua Te Whanganui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Amend	Amend for consistency with WIP recommendations	Amend chapeau to add 'sediment'; Amend a) to direct collection of robust baseline state data in all rural catchments (delete proposed text); Amend b) to direct groundtruthing and identification of priority catchments for improvement (delete proposed text); Amend c) and d) to direct promoting and supporting strategic riparian and hill-slope planting (delete proposed text) Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.082	8 Whaitua Te Whanganui-a-Tara	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Oppose	Addressed by relief sought on Policy P21; Periphyton has not been identified as an issue requiring nitrogen controls. Data from the few sites monitored by Council (2021/22 river monitoring report) show no sites below national bottom lines in this whaitua.	Delete P22; or alternatively delete proposed text and amend to direct that Council undertake monitoring of periphyton as directed by NOF (requirement introduced in 2014) at SOE monitoring sites and also at catchment sites (location to be determined through the Freshwater Action Plan process). Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.083	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from	Oppose	Addressed by relief sought on P21; the erosion risk methodology is uncertain and hasn't been ground-truthed; and Council cannot require revegetation by regulation	Delete P23 Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		farming activities on land with high risk of erosion.			
S193.084	8 Whaitua Te Whanganui-a-Tara	Policy WH.P24: Phasing of farm environment plans.	Oppose	Considers farm plans are already covered by national regulation	Delete P24 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.085	8 Whaitua Te Whanganui-a-Tara	Policy WH.P25: Managing rural land use change.	Oppose	Considers the provision is disproportionate to the reality of rural land use in the whaitua	Delete P25 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.086	8 Whaitua Te Whanganui-a-Tara	Policy WH.P26: Managing livestock access to small rivers.	Amend	Considers no evidence has been presented on the extent to which stock access in the low stocking rate farms in those catchments are contributing to bank erosion and reduced clarity	Amend to direct groundtruthing of bank erosion in the Makara and Mangaroa catchments, investigation of natural sources related to clarity (eg, Mangaroa/peat) and identification of prioritised locations/reaches for supporting riparian planting; Delete text as notified Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.087	8 Whaitua Te Whanganui-a-Tara	Policy WH.P27: Promoting stream shading.	Amend	Amend to be consistent with relief sought on the objectives	Amend to read promoting **and supporting;** Delete proposed text from "where nutrient reductions...." Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.088	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in	Oppose	Considers this is addressed by existing national and regional regulation	Delete P28 Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		sediment discharges from plantation forestry.			
S193.089	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Oppose	Considers this is addressed by existing NRP provisions which were recently made operative subsequent to mediated agreements.	Delete P29 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.090	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Oppose	Considers this is addressed by existing NRP provisions which were recently made operative subsequent to mediated agreements.	Delete P30 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.091	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Not Stated	Considers this is addressed by existing NRP provisions which were recently made operative subsequent to mediated agreements.	Delete P31, or specify application to urban only Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.092	8 Whaitua Te Whanganui-a-Tara	Policy WH.P32: Minimum flows and minimum water levels in Whaitua Te Whanganui-a-Tara.	Amend	Amend for consistency	Amend to make provision for takes below minimum flows as provided for in Chapter 9 Policy P31 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.093	8 Whaitua Te	Policy WH.P33:	Amend	Amend for improved clarity	Not Stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	Core allocation in Whaitua Te Whanganui-a-Tara.			
S193.094	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity.	Amend	Amend to be consistent with relief sought for national Freshwater Farm Plans	Delete R17 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.095	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land - controlled activity.	Oppose	Retain operative NRP rule	Delete R18 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.096	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance - discretionary activity.	Oppose	Retain operative NRP rule	Delete R19 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.097	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Oppose	Retain operative NRP rule	Delete R20 Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S193.098	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry - discretionary activity.	Oppose	Retain operative NRP rule	Delete R21 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.099	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.	Oppose	Retain operative NRP rule	Delete R22 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.100	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	Amend to be consistent with relief sought for national Freshwater Farm Plans	Delete R23 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.101	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Oppose	Retain operative NRP rule	Delete R24 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.102	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Oppose	Retain operative NRP rule	Delete R25 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.103	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities	Oppose	Insufficient evidence that this is effective and efficient	Delete R26 Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		on a property of between 4 hectares and 20 hectares - permitted activity.			
S193.104	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Amend	Amend to be consistent with relief sought for national Freshwater Farm Plans	Delete R27 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.105	8 Whaitua Te Whanganui-a-Tara	Table 8.6: Phase-in of farm environment plans for part Freshwater Management Units.	Oppose	Considers timeframes will be set in the national rollout	Delete Table 8.6 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.106	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Oppose	Consistent with WFF relief sought on policies	Delete R28 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.107	8 Whaitua Te	Rule WH.R29:	Oppose	Consistent with WFF relief sought on policies	Delete R29

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	Livestock access to a small river - discretionary activity.			Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.108	8 Whaitua Te Whanganui-a-Tara	Rule WH.R30: The use of land for farming activities - discretionary activity.	Oppose	Amend for consistency with relief sought on objectives seeking relevant data for relevant catchments	Delete R30 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.109	8 Whaitua Te Whanganui-a-Tara	Rule WH.R31: Change of rural land use - discretionary activity.	Oppose	Considers rule is disproportionate to any real evaluation of existing and future rural land use	Delete R31 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.110	8 Whaitua Te Whanganui-a-Tara	Rule WH.R32: Farming activities - non-complying activity.	Oppose	Considers rule is disproportionate to any real evaluation of existing and future rural land use	Delete R32 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.111	8 Whaitua Te Whanganui-a-Tara	Rule WH.R33: Take and use of water in the Whaitua Te Whanganui-a Tara -	Amend	Amend for improved efficiency	Amend to controlled activity (delete RD) Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		restricted discretionary activity.			
S193.112	9 Te Awarua-o-Porirua Whaitua	Objective P.O1: The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100.	Amend	Amend for consistency with NPS-FM and WIP values	First bullet - delete or clarify meaning Second bullet - delete "in a natural state" Fourth bullet - delete or reword to express vision for natural character Add bullet to provide for sustaining a thriving primary production sector Add bullet providing for harbour sedimentation to be reduced to a more natural level Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.113	9 Te Awarua-o-Porirua Whaitua	Objective P.O2: Te Awarua-o-Porirua's groundwater, rivers, lakes and natural wetlands, and their margins are on a	Amend	Amend for consistency with NPS-FM and NOF values; and to clarify distinction between the trajectory of improvement and the achievement of wai ora	Delete b, d, f and g Add clause providing for a thriving primary production sector including through the provision of reliable water Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		trajectory of measurable improvement towards wai ora.			
S193.114	9 Te Awarua-o-Porirua Whaitua	Objective P.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Pāuatahanui Inlet, Onepoto Arm and the open coastal areas of Te Awarua-o-Porirua is maintained or improved to achieve the coastal water objectives set out in Table 9.1.	Amend	References general comments regarding Target attribute states and timeframes	Amend chapeau to delete "to achieve" and to read **'improve where TAS are not met';** Delete a-h Add clause directing the collection of robust baseline data and development of prioritised timeframes for TAS for incorporation in a future variation Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S193.115	9 Te Awarua-o-Porirua Whaitua	Table 9.1: Coastal water objectives.	Amend	Considers numeric targets cannot reasonably be set in the absence of numeric baselines	Delete timeframes Add column showing baseline state; Amend numeric targets to read **'maintain or improve'** Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.116	9 Te Awarua-o-Porirua Whaitua	Objective P.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased, and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status.	Amend	Outside council control	Delete reference to improving threat classification status Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S193.117	9 Te Awarua-o-Porirua Whaitua	Objective P.O5: Groundwater flows and levels, and water quality, are maintained.	Support	Considers objective is proportionate to the context	Retain as notified
S193.118	9 Te Awarua-o-Porirua Whaitua	Table 9.2: Target attribute states for rivers.	Amend	Considers baseline state should not be based on old or incomplete or modelled or default data	Delete timeframes Delete all sites/attributes which are based on limited or modelled estimates Delete columns titled Part FMU default TAS Amend NOF attributes to use NOF compliant metrics and statistics Amend baseline state to use current data (eg. 2021/22 council monitoring data) Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.119	9 Te Awarua-o-Porirua Whaitua	Policy P.P1: Improvement of aquatic ecosystem health.	Amend	For consistency with WIP recommendations for a more strategic and prioritised approach	Add new clause **aa) directing improved understanding of key contaminant sources, their connection to waterways and spatial/temporal patterns, and identification of a prioritised programme** Amend a) to add **'progressively reducing in priority catchments/locations'.** Amend b) to read **'progressively restoring habitats in priority locations'.** Add new clause **e) to provide for Council to enter into**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					voluntary buy-out of sites/land where significant changes in land use activities may be required Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.120	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	Consistent with WIP recommendations to provide incentives to assist implementation of existing national and regional regulations; and consistent with NRP Method M12	Amend e) to read **promote and support riparian fencing and planting** (delete proposed text); Amend f) to read **promote and support erosion and sediment control** (delete proposed text); Delete g) and h) Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.121	9 Te Awarua-o-Porirua Whaitua	Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Amend	For consistency with the NPS-FM; and for an achievable work programme	Minor edits as follows: Delete "all" to read **"urban" FAPs to be completed by December 2026, and "rural" FAPs to be completed by December 2027;** Add direction to identify appropriate and prioritised timeframes for TAS (for incorporation in a future variation) Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.122	9 Te Awarua-o-Porirua Whaitua	Policy P.P4: Contaminant load reductions.	Amend	Considers there is insufficient evidence to support the proposed reductions	Amend to delete a) and b) Add clause directing sediment source studies to establish fit for purpose information on relative sources and spatial-temporal patterns including consideration of natural factors impacting clarity (eg, Mangaroa/peat, Pauhatanui/soft-bottom substrate) and to help identify and prioritise catchments/actions

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.123	9 Te Awarua-o-Porirua Whaitua	Table 9.3: Harbour arm catchment contaminant load reductions.	Amend	Considers the supporting evidence is too uncertain	Delete Table 9.3 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.124	9 Te Awarua-o-Porirua Whaitua	Table 9.4: Part Freshwater Management Unit sediment load reductions required to achieve the visual clarity target attribute state.	Amend	Considers evidence is insufficient	Delete Table 9.4 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.125	9 Te Awarua-o-Porirua Whaitua	Policy P.P5: Localised adverse effects of point source discharges.	Amend	Amend for improved clarity	Amend chapeau to read **"including by avoiding or minimising"** Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.126	9 Te Awarua-	Policy P.P6: Point	Amend	Amend to be consistent with WFF relief on objectives	Amend chapeau to read **avoided or minimised;** Amend part FMU to read **"monitored rivers"**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	source discharges .			Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.127	9 Te Awarua-o-Porirua Whaitua	Policy P.P7 Discharges to groundwater.	Amend	Considers NRP PC1 does not provide evidence of degraded groundwater	Amend to delete the reference to "existing discharges ..." and insert a requirement for investigation and groundtruthing of degraded groundwater Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.128	9 Te Awarua-o-Porirua Whaitua	Policy P.P8 Avoiding discharges of specific products and waste.	Amend	Amend for consistency with c) and d)	Amend b) to read **untreated human or animal effluent** (delete proposed text) Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.129	9 Te Awarua-o-Porirua Whaitua	Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Amend	Amend for consistency with intent	Amend chapeau to read stormwater network discharges Make any consequential amendment(s) necessary
S193.130	9 Te Awarua-o-Porirua Whaitua	Policy P.P10: Managing adverse effects of stormwater discharges .	Amend	Amend for consistency with intent	Amend chapeau to read stormwater **network** discharges Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S193.131	9 Te Awarua-o-Porirua Whaitua	Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Amend	Amend for consistency with WIP recommendations	Amend chapeau to add sediment; Amend a) to direct collection of robust baseline state data in all rural catchments (delete proposed text); Amend b) to direct groundtruthing and identification of priority catchments for improvement (delete proposed text); Amend c) and d) to direct promoting and supporting strategic riparian and hill-slope planting (delete proposed text) Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.132	9 Te Awarua-o-Porirua Whaitua	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Oppose	Addressed by relief sought on Policy P21; Periphyton has not been identified as an issue requiring nitrogen controls. Data from the few sites monitored by Council (2021/22 river monitoring report) show no sites below national bottom lines in this whaitua.	Delete P21 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.133	9 Te Awarua-o-Porirua Whaitua	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high	Oppose	Addressed by relief sought on P21; the erosion risk methodology is uncertain and hasn't been ground-truthed; and Council cannot require revegetation by regulation	Delete P22 Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		risk of erosion.			
S193.134	9 Te Awarua-o-Porirua Whaitua	Policy P.P23: Phasing of farm environment plans.	Oppose	Considers farm plans are already covered by national regulation	Delete P23 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.135	9 Te Awarua-o-Porirua Whaitua	Policy P.P24: Managing rural land use change.	Oppose	Considers the provision is disproportionate to the reality of rural land use in the whaitua	Delete P24 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.136	9 Te Awarua-o-Porirua Whaitua	Policy P.P25: Promoting stream shading.	Amend	Amend to be consistent with relief sought on the objectives	Amend to read promoting **and supporting;** Delete proposed text from "where nutrient reductions...." Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.137	9 Te Awarua-o-Porirua Whaitua	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Oppose	Considers this is addressed by existing national and regional regulation	Delete P26 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.138	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Oppose	Considers this is addressed by existing NRP provisions which were recently made operative subsequent to mediated agreements.	Delete P27 Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S193.139	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Oppose	Considers this is addressed by existing NRP provisions which were recently made operative subsequent to mediated agreements.	Delete P28 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.140	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose	Considers this is addressed by existing NRP provisions which were recently made operative subsequent to mediated agreements.	Delete P29 Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.141	9 Te Awarua-o-Porirua Whaitua	Policy P.P31: Water takes at minimum flows and minimum water levels.	Support	Supports for clarity	Retain P31 as written Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.142	9 Te Awarua-o-Porirua Whaitua	Policy P.P32: Allocation in the Te Awarua-o-Porirua Whaitua.	Amend	Amend for consistency	Minor edit as follows: Amend a) to provide for the greater of the total allocated by resource consents or the allocation amounts Amend b) to read **30%** (delete 20%) Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.143	9 Te Awarua-o-Porirua Whaitua	Rule P.R16: Vegetation clearance on highest erosion risk land-	Amend	Amend to be consistent with relief sought for national freshwater farm plans	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
S193.144	9 Te Awarua-o-Porirua Whaitua	Rule P.R17: Vegetation clearance on highest erosion risk land - controlled activity.	Oppose	Retain operative NRP rule	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.145	9 Te Awarua-o-Porirua Whaitua	Rule P.R18: Vegetation clearance - discretionary activity.	Oppose	Retain operative NRP rule	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.146	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry - controlled activity.	Oppose	Retain operative NRP rule	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.147	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry - discretionary activity.	Oppose	Retain operative NRP rule	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.148	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land -	Oppose	Retain operative NRP rule	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		prohibited activity.			
S193.149	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Amend	Amend to be consistent with relief sought for national Freshwater Farm Plans	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.150	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Oppose	Retain operative NRP rule	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.151	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks - non-complying activity.	Oppose	Retain operative NRP rule	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.152	9 Te Awarua-o-Porirua Whaitua	Rule P.R25: Farming activities on properties of between 4 hectares and 20 hectares - permitted activity.	Oppose	Insufficient evidence that this is effective and efficient	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.153	9 Te Awarua-o-Porirua Whaitua	Rule P.R26: Farming activities	Amend	Amend to be consistent with relief sought for national Freshwater Farm Plans	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		on 20 hectares or more of land - permitted activity.			
S193.154	9 Te Awarua-o-Porirua Whaitua	Table 9.5: Phase in of farm environment plans for Part Freshwater Management Units.	Oppose	Consistent with WFF relief sought on policies	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.155	9 Te Awarua-o-Porirua Whaitua	Rule P.R27: The use of land for farming activities - discretionary activity.	Oppose	Consistent with WFF relief sought on policies	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.156	9 Te Awarua-o-Porirua Whaitua	Rule P.R28: Change of rural land use - discretionary activity.	Oppose	Considers rule is disproportionate to any real evaluation of existing and future rural land use	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.157	9 Te Awarua-o-Porirua Whaitua	Rule P.R29: Farming activities - non-complying activity.	Oppose	Considers rule is disproportionate to any real evaluation of existing and future rural land use	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S193.158	9 Te Awarua-o-Porirua Whaitua	Rule P.R30: Take and use of water - permitted activity.	Oppose	Considers there is insufficient evidence to justify change	Delete R30 (retain existing operative rule) Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.159	9 Te Awarua-o-Porirua Whaitua	Rule P.R31: Take and use of water - restricted discretionary activity.	Amend	Amend for improved efficiency	Amend to controlled activity Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.160	12 Schedules	A Freshwater Action Plans	Amend	Considers FAPs should be prepared at finer catchment scale to provide for proper local engagement, ground truthing and prioritising; determine baseline state which does not rely on defaults; and align with preparation of Catchment Context, Challenges and Values documents to support national Freshwater Farm Plans	Amend to read 'catchment' (delete part-FMU) Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.161	12 Schedules	A1 Purpose	Amend	Amend for improved efficiency and effectiveness	Amend to: direct identification of prioritised timeframes for TAS direct identification and prioritisation of the best bang for buck interventions; and explicitly describe funding mechanisms to support delivery Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.162	12 Schedules	A2 Freshwater Action Plans required in Whaitua	Amend	Not stated	Amend Part FMU column to read catchment and name the catchments Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Te Whanganui-a-Tara.			
S193.163	12 Schedules	A3 Freshwater Action Plans required in Te Awarua-o-Porirua Whaitua.	Amend	Not stated	Amend Part FMU column to read catchment and name the catchments Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.164	12 Schedules	B1. Principles.	Amend	Amend for improved consistency with NPS-FM	Amend 1) to provide for engagement with community; Amend 5) to direct preparation at catchment scale (unless whole or part FMU is more appropriate, eg, for fish passage); Amend 6) to add identifying and prioritising best bang for buck interventions; Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.165	12 Schedules	B2. General Content.	Amend	Amend to be consistent with relief sought on objectives	Amend a) to direct identification of baseline state based on robust measured data at catchment scale; Add 2b) to 1 and expand to add prioritisation of best bang for buck actions Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.166	12 Schedules	B3 Necessary actions.	Amend	Amend to be consistent with relief sought on objectives and policies	Amend 1A (first paragraph) to direct sediment source studies to establish fit for purpose information on the relative sources and spatial-temporal patterns in sediment transport to water, including consideration of rabbits and pigs, and to identify best bang for buck prioritisation (delete proposed text): amend ai) to direct the urgent analysis of efforts and costs to date to de-stock and revegetate council owned land

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					Amend 2a) to direct e. coli source studies to establish fit for purpose information on relative sources of e coli to water, including wildfowl and pigs, and to identify best bang for buck prioritisation Amend 3 to direct periphyton monitoring as per NOF requirements; amend all references to Farm Environment Plans to read national FW Farm Plan. Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.167	12 Schedules	C. Freshwater Action Plans in Whaitua Te Whanganui-a-Tara	Amend	Amend to be consistent with relief sought on policies	Amend 5a) to delete proposed text up to "encourage revegetation...." Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.168	12 Schedules	D Freshwater Action Plans in Te Awarua-o-Porirua Whaitua	Amend	Amend to be consistent with relief sought on objectives and policies	Amend 5a) to direct periphyton monitoring; Add at the end "in order to identify options for improvement" Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.169	12 Schedules	A Context	Amend	Amend for clarity	Amend to specify application to urban/infrastructure developments only Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.170	12 Schedules	Schedule 33: Vegetation Clearance Erosion	Oppose	References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and Sediment Management Plan.			
S193.171	12 Schedules	A Purposes of the Erosion and Sediment Management Plan	Oppose	References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.172	12 Schedules	B Management objectives	Oppose	References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.173	12 Schedules	C Requirements of the Erosion and Sediment Management Plan	Oppose	References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.174	12 Schedules	C1 Contents of the Erosion and Sediment Management Plan	Oppose	References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.175	12 Schedules	D Amendment of Erosion and Sediment	Oppose	References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Management Plan			
S193.176	12 Schedules	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	Oppose	References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.177	12 Schedules	A Purpose of the Erosion and Sediment Management Plan	Oppose	References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.178	12 Schedules	B Management objectives	Not Stated	References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.179	12 Schedules	C Requirements of the Erosion and Sediment Management Plan	Oppose	References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.180	12 Schedules	C1 Contents of the Erosion and Sediment Management Plan	Oppose	References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S193.181	12 Schedules	C2 Certification of the Erosion and Sediment Management Plan	Oppose	References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.182	12 Schedules	D Amendment of Erosion and Sediment Management Plan	Oppose	References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.183	12 Schedules	Schedule 35: Small farm registration.	Oppose	References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.184	12 Schedules	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Oppose	References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S193.185	12 Schedules	A Certification requirements under the Resource Management (Freshwater Farm Plans) Regulations 2023.	Oppose	References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.186	12 Schedules	B Management objectives.	Oppose	References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.187	12 Schedules	C Content of a farm environment plan.	Oppose	References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.188	12 Schedules	D Risk assessment and mitigation to address risk.	Oppose	References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.189	12 Schedules	Table D1. Financial contribution calculations for residential greenfield development	Oppose	References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S193.190	12 Schedules	E Erosion Risk Treatment Plan.	Oppose	References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.191	12 Schedules	F Small stream riparian programme.	Oppose	References to general comments regarding Sediment from land disturbances (earthworks and vegetation clearance).	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.192	13 Maps	Map 78: Part freshwater management units and target attribute state sites (rivers) - Te Awarua-o-Porirua.	Amend	Amend to be consistent with relief sought on objectives	Amend to show catchments Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.193	13 Maps	Map 79: Part freshwater management units and target attribute state sites (rivers) - Te Whanganui-a-Tara.	Amend	Amend to be consistent with relief sought on objectives	Amend to show catchments Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.194	13 Maps	Map 80: Part freshwater management units	Amend	Amend to be consistent with relief sought on objectives	Amend to show catchments Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and target attribute state sites (lakes) - Te Whanganui-a-Tara.			
S193.195	13 Maps	Map 90: Highest and high erosion risk land (Pasture) - Te Awarua-o-Porirua.	Oppose	Considers the methodology is not fit for purpose	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.196	13 Maps	Map 91: Highest erosion risk land (Woody vegetation) - Te Awarua-o-Porirua.	Oppose	Considers the methodology is not fit for purpose	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.197	13 Maps	Map 92: Highest erosion risk land (Plantation forestry) - Te Awarua-o-Porirua.	Oppose	Considers the methodology is not fit for purpose	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.198	13 Maps	Map 93: Highest and high erosion	Oppose	Considers the methodology is not fit for purpose	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		risk land (Pasture) - Te Whanganui-a-Tara.			
S193.199	13 Maps	Map 94: Highest erosion risk land (Woody vegetation clearance) - Te Whanganui-a-Tara.	Oppose	Considers the methodology is not fit for purpose	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.
S193.200	13 Maps	Map 95: Highest erosion risk land (Plantation forestry) - Te Whanganui-a-Tara.	Oppose	Considers the methodology is not fit for purpose	Delete Make any consequential amendment(s) necessary to give effect to the relief sought.

S256 Waste Management NZ Limited

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S256.001	General comment	General comments - overall	Not Stated	Supports maintaining and improving water quality in the Wellington Region, but considers PC1 goes beyond the control of land for the purpose of maintaining the quantity and quality of water bodies and coastal waters, and steps into strategic planning and controlling the location of land use development.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers without the amendments proposed by the submitter to PC1, the provisions will not: a) promote the sustainable management of resources or achieve the purchase of the RMA and are contrary to Part 2 and other provisions of the RMA; b) enable the social and economic wellbeing of the community; c) meet the reasonably foreseeable needs of future generations; d) achieve integrated management of the effects of use, development or protection of land and resources in the Wellington Region; e) enable the efficient use and development of Waste Management's assets and operations, and of those resources; and f) appropriately achieve the objectives of the Regional Policy Statement, in terms of section 32 of the RMA.	
S256.002	2 Interpretation	High risk industrial or trade premise	Oppose	Considers the definition is ambiguous and should instead refer to 'high risk industrial and trade areas'. Considers the definition should specifically exclude sites (or parts of a site) where industrial and trade activities are undertaken but there is no discharge from these activities to stormwater. Notes various consequential amendments may be required throughout PC1 to address this submission point.	Amend definition as follows: High risk industrial and trade ~~premise~~ **areas: Areas of a site where industrial or trade activities are undertaken that drain to a stormwater network, or private stormwater management system that discharges to water or to land where there is potential for the discharge to enter water. Industrial and trade activities: Industrial and trade activities in the high risk industrial and trade areas definition are those that store, use or generate contaminants or hazardous substances on site that are exposed to rain and could become entrained in stormwater**. Any other relief or consequential amendments necessary to address the concerns set out in this submission.
S256.003	2 Interpretation	Impervious surfaces	Amend	Supports the inclusion of a definition of impervious surfaces but seeks amendment to the list of surfaces excluded from the definition. Considers the exclusion relating to 'roof areas with rainwater collection and reuse' requires clarification	Amend definition of 'Impervious Surface' as follows: Surfaces that prevent or significantly impede the infiltration of stormwater into soil or the ground, includes: roofs paved areas (including sealed/compacted metal) such as roads, driveways, parking areas, sidewalks/foot paths or patios, and

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				to note that 100% retention is not required as this would cover instances where there are overflows from retention tanks.	excludes: grassed areas, gardens and other vegetated areas, porous or permeable paving **or concrete (including driveways, roads and parking areas**), slatted decks which allow water to drain through to a permeable surface, porous or permeable paving and living roofs, roof areas with rainwater collection and reuse, any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed, and excluding any overflows), any impervious surfaces where water is directed to living walls. Any other relief or consequential amendments necessary to address the concerns set out in this submission.
S256.004	2 Interpretation	Stormwater	Support	Support definition as it is consistent with the National Planning Standards	Retain as notified.
S256.005	2 Interpretation	Stormwater network	Amend	Notes a stormwater network is commonly understood to be that controlled by a network utility operator and not assets (such as ponds) which remain in private ownership.	Amend the definition of 'Stormwater Network' as follows: The network of devices designed to capture, detain, treat, transport and/or discharge stormwater, including but not limited to stormwater treatment systems, kerbs, intake structures, pipes, soak pits, sumps, swales and constructed ponds and wetlands, and that serves a road or more than one property. **Stormwater assets which have not been vested and remain in private ownership do not form part of the stormwater network for the purposes of this definition**. Any other relief or consequential amendments necessary to address the concerns set out in this submission.
S256.006	2 Interpretation	Unplanned greenfield development	Oppose	Considers the definition is ambiguous and will unduly restrict development because it refers to "Greenfield Development" which is not a defined term and it refers to Greenfield Development which "requires an underlying zone change". Notes that no activity "requires an underlying zone change" unless it is already identified as a prohibited activity, as consent can be sought in relation to all other activity statuses.	Amend the definition of 'Unplanned Greenfield Development' as follows: ~~Greenfield~~ Development **of sites** within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 ~~which also require an underlying zone change (from rural/non- urban/open space to urban) though a District Plan change to enable the development.~~ **that rely on the construction of public infrastructure. Public infrastructure is any wastewater, stormwater, water supply pipe or road that is not in private ownership. Unplanned greenfield development excludes: -sites where consents have been lodged with a Territorial Authority for urban activities prior to 30th October 2023.**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					-Sites where land use consents have been granted for urban activities, including where those consents have not yet been implemented and have not lapsed. - Development that requires upgrades or modification of existing infrastructure, including road widening. - Development within any mapped unplanned development area that has an urban zone. -Waste management facilities, including resource recovery parks, refuse transfer and recycling facilities. Note: Unplanned greenfield areas are those areas shown on maps 86, 87, 88 and 89. ~~those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023~~. Any other relief or consequential amendments necessary to address the concerns set out in this submission.
S256.007	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces – discretionary activity.	Oppose	Concerned the stormwater provisions do not appropriately provide for industrial and trade activities.	Amend to provide for industrial and trade activities. Any other relief or consequential amendments necessary to address the concerns set out in this submission.
S256.008	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity.	Oppose	Concerned the stormwater provisions do not appropriately provide for industrial and trade activities.	Amend to provide for industrial and trade activities. Any other relief or consequential amendments necessary to address the concerns set out in this submission.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S256.009	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Oppose	Opposes the policy direction to prohibit unplanned greenfield development. 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 target attribute states. Considers each proposal requires assessment on a case by-case basis. Considers 'restricting' discharged would better achieve the intent of higher order documents.	Amend Policy WH.P2(a) as follows: Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (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 Any other relief or consequential amendments necessary to address the concerns set out in this submission.
S256.010	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Amend	Seeks consequential amendment to refer to 'high risk industrial and trade area'.	Consequential amendment to refer to 'high risk industrial and trade **area**'. Any other relief or consequential amendments necessary to address the concerns set out in this submission.
S256.011	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Oppose	Considers the definition of 'unplanned greenfield development' is ambiguous. Considers avoiding all stormwater discharges is not practicable with stormwater discharges still likely in higher intensity rainfall events. Considers the policy may have the consequence of restricting or preventing individual land use developments in the rural zone.	Amend Policy WH.P16 as follows: ~~Avoid~~ **Minimise** all new stormwater discharges from unplanned greenfield development where the discharge will enter a surface water body or coastal water, including through an existing local authority stormwater network. Any other relief or consequential amendments necessary to address the concerns set out in this submission.
S256.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new	Oppose	Notes use of prohibited activity status must be subject of a robust section 32 analysis demonstrating that it is the most appropriate of the options available. Considers the circumstances	Delete Rule WH.R13 or if retained amend the activity status to discretionary or non complying and revise the definitions and intent of the rule for clarity of intent and application. Any

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		unplanned greenfield developm ent – prohibited activity.		where prohibited activity status might be considered appropriate are not present. Considers there is no evidence that the discharge of stormwater from impervious surfaces from unplanned greenfield development will have an unacceptable effect in all cases. and suggests adverse effects associated with the establishment of new impervious surfaces can be appropriately identified and managed through the resource consent process, including through the decline of resource consent. Considers the rule is ambiguous as it will not always be clear that new impervious surfaces are associated with 'unplanned greenfield development', given the ambiguity of that defined term, and has the potential to restrict land use activities that can appropriately be undertaken in the rural zone with resource consent or as a permitted activity.	other relief or consequential amendments necessary to address the concerns set out in this submission.
S256.013	5.1 Air quality rules	Rule R35: Water and wastewate r processes – permitted activity.	Support	Support Rule R35	Retain as notified.
S256.014	13 Maps	Map 89: Unplanned greenfield areas – Hutt City Council.	Oppose	Opposes the inclusion of 30 Benmore Crescent within the 'unplanned greenfield development area' as shown on Map 89. Notes that planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'.	30 Benmore Crescent be deleted from the 'unplanned greenfield development' overlay on Map 89. Any other relief or consequential amendments necessary to address the concerns set out in this submission.

S246 Water New Zealand

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S246.001	General comments	General comments - overall	Support	Broadly supports PPC1 and its focus on water quality and ecological health objectives to implement the NPS-FM.	Not stated
S246.002	General comments	General comments - freshwater	Amend	Notes the NPS-FM requires regional plans and policy statements to embed Te Mana o te Wai into decision making and considers requiring local kaupapa Māori in decision-making structures will ensure that Te Mana o te Wai, the spiritual wellbeing and whakapapa of Te Hurihanga Wai (the water cycle) is prioritised, respected, protected and enhanced.	Te Mana o te Wai hierarchy of obligations are made clearer in the definitions and objectives, including prioritising mana whenua, their whakapapa and tikanga, in freshwater management and decision making. PC1 instils an integrated catchment approach that recognises the interconnected nature of a catchment, the receiving environments and Te Hurihanga Wai, and that includes wastewater, stormwater and drinking water supply, rather than individual plans or strategies for each network. PC1 states clearly that Te Mana o te Wai guides all policy, plans and consents that impact on three waters, from the earliest stage of consideration and before options are presented to regional council, planning committee or consulted on with communities.
S246.003	General comments	General comments - definitions	Amend	Notes the term [community] drinking water is used extensively through PC1 but the definitions do not include drinking water, or drinking water source.	Include definitions for [community] drinking water and drinking water
S246.004	General comments	General comments - stormwater management	Not Stated	Considers new developments are increasingly being required to include stormwater capture and retention but these systems can become a public health risk if not managed properly, including ponding and flooding. Notes some councils have developed performance criteria and identified acceptable solutions, such as Wellington Water's Water Sensitive Design for Stormwater: Treatment Device Guideline (2019) and Auckland Council's guideline document Stormwater Management Devices in the Auckland region, GD2017/001.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S246.005	General comments	General comments - stormwater management	Support	Commends the proactive approach on addressing zinc and copper from human activities for ecological health for the region. Notes Water NZ have recommended to MBIE that the building consent system should put in place methods to manage water quality, including controls on cladding and/or roofing materials (including guttering and spouting). Such conditions could include; Building materials are sealed or otherwise finished to prevent water runoff which contains copper or zinc. Buildings shall avoid the use of unpainted roofing or spouting materials containing zinc or copper to minimise contaminant runoff. Any development will need to treat these surfaces or the stormwater from these surfaces to avoid copper or zinc from entering stormwater. Stormwater from copper or zinc surfaces is to be collected and treated. Notes that district and regional plans now require avoiding the use of inert materials such as unpainted roofing or spouting materials containing copper or zinc to minimise contaminant runoff.	Recommends GWRC include similar provisions for zinc and copper in the changes to the NRP to those in other district and regional plans.
S246.006	General comments	General comments - wastewater	Amend	Supports the wastewater rules but is concerned with the lack of provisions for biosolids and minimal recognition of onsite wastewater systems. Notes Water NZ have been working in partnership with other industry stakeholders to update the Safe Application of Biosolids to Land in New Zealand, 2003 and are hoping to have a version published in early 2024.	Make reference and make use of the forthcoming Guidelines for Beneficial Use of Organic Materials on Productive Land, 2024.
S246.007	General comments	General comments - current legislation	Not Stated	Notes NRP must also be consistent with the Water Services Entities Act 2022 (section 253) provisions for a transport corridor manager that owns or operates a transport stormwater system.	Not stated
S246.008	General comments	General comments -	Not Stated	Not stated	PC1 gives greater emphasis to prioritising Te Hurihanga Wai (the water cycle), recognising the value and necessity of circularity, and integrated management planning and

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		wastewater			delivery. Amend so any wastewater reduction strategy must be part of an integrated catchment planning approach and include building community awareness of the true value of water.
S246.009	General comments	General comments - fresh water	Not Stated	Supports the cumulative and localised impact of stormwater and wastewater discharges on drinking water supplies and community drinking water supplies given consideration but considers that drinking water, the sources, protection, allocation and efficient use of water need more consideration though the plan, as part of the second obligation of Te Mana o Te Wai.	Provide more consideration of drinking water, the sources, protection, allocation and efficient use of need more consideration though the plan, as part of the second obligation of Te Mana o Te Wai.
S246.010	General comments	General comments - earthworks	Support	Supports the Earthworks rules in both Whaitua chapters.	Not stated
S246.011	General comments	General comments - stormwater management	Oppose	Generally supports the new policy and rule framework for stormwater. Is concerned about the resource intensive, multi-layer requirements, conflict and complete duplication of requirements under the Water Services Entities Act 2022. Notes PC1 requires a Stormwater Management Strategy, Stormwater Management Plans and Stormwater Impact Assessments to be produced for networks and catchments and consider this to be replication of effort. Notes there are many other key plans to be prepared under the Water Services Entities Act 2022 including, but not limited to, asset management plans, infrastructure strategies, Te Mana o Te Wai statements and statement of intent. These are all relevant to, and would add value and efficiency to, PC1 requirements. Notes opportunities to consolidate or rationalise regulatory planning, monitoring and reporting, and that these requirements can apply across legislative regimes. Notes PC1 policy, rules and consents must also	Amend PC1 requirements for stormwater and wastewater strategies into an integrated Catchment Planning approach, which is informed by and appends asset management plans and stormwater and wastewater network plans. The regulatory reporting requirements under PC1, must support, be consistent with, and not duplicate, the approach taken in the Water Services Entities Act 2022 and by other industry regulators (e.g. Taumata Arowai and the Commission). PC1 is assessed for consistency and integration, including reviewing all terms, definitions and policy outcomes in the Water Services Entity Act 2022.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				reflect the economic regulator's information disclosure and price-quality standards monitoring of water services provision.	
S246.012	General comments	General comments - current legislation	Not Stated	The Water Services Act 2021 introduces new mandatory requirements to monitor and report on the environmental performance of drinking water, wastewater and stormwater networks and their operators. Environmental limits and targets that affect three waters infrastructure need to align with the environmental performance measures, targets and standards set by Taumata Arowai in accordance with the Water Services Act 2021, specifically the Network Environmental Performance Measures. Taumata Arowai are currently drafting standards and consent conditions for wastewater networks, overflows and treatment plants and intend to introduce wastewater and stormwater measures at a future date. GWRC should consult with them on any proposed measures, for example the requirements in Schedule 32: Wastewater Improvement Strategy, to ensure consistency in requirements.	GWRC consult with Taumata Arowai on any proposed measures, for example the requirements in Schedule 32: Wastewater Improvement Strategy, to ensure consistency in requirements.
S246.013	General comments	General comments - current legislation	Not Stated	Notes inconsistencies in the requirements and the consent and compliance process across consent authorities creates inefficiencies, increases the regulatory burden for designers, technology providers and service providers.	Reduce inconsistencies to avoid situations where applicants receive substantially different requests for information, or even different decisions, when making applications for the same type of system.
S246.014	General comments	General comments - current legislation	Not Stated	Notes Regional councils will remain responsible for regulation, compliance, and enforcement of fresh, waste and storm water quality and natural hazards policy and planning under new regulatory tools from new economic and quality water regulators.	Council must enforce rules and plans in place and proposed - this includes, but not limited to, wastewater treatment plant consenting, sediment and erosion control, and land-use planning restrictions on high-risk susceptible land.
S246.015	General comments	General comments - wastewater	Not Stated	Considers more regulatory improvements are necessary for onsite wastewater systems as if not adequately managed or regulated can lead to in system failures, or worse, significant public or environmental health risk. Notes current policies and practices applying to the design and	Amend so policy and rules for onsite wastewater systems consider all stages of a systems design life - design, construction, inspection, maintenance, and compliance inspections. GWRC through Te Ura Kahika, with the Ministry for Building, Innovation and Employment, and the water quality regulator,

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				maintenance of onsite wastewater management systems vary. Notes considering the relevance of the National Objective Framework, and identifying baseline state and set target attribute states, it would be appropriate for PC1 to consider onsite wastewater systems and their potential risk to drinking water supplies, waterbody health and the wider environment. We request policy and rules for onsite wastewater systems consider all stages of a systems design life - design, construction, inspection, maintenance, and compliance inspections. This might include; -Setting minimum design, performance standards and maintenance standards. Such conditions or verification methods could be similar to Verification Method G13/VM4 Foul Water: On-Site Disposal which requires on-site systems to be designed and installed to AS/NZS 1547:2012 On-site Domestic-Wastewater Management. -Establishing GIS based recording portal of all systems, including those currently considered to be permitted activities. ECAN in collaboration ESR undertook GIS mapping and assessment of risks posed by systems. Employing consistent approaches for GIS mapping amongst regional councils will help us develop nationally consistent approaches for managing risks over time.	Taumata Arowai, draft standard consent conditions or verification methods for ongoing maintenance, performance, and compliance of on-site wastewater systems.
S246.016	General comments	General comments - consultation	Not Stated	Considers engagement is important for all stages of the water sector- from Te Mana o Te Wai practitioners, to treatment plant designers and operators, to on-site contractors managing sediment and erosion control conditions.	Engage further with utility operators as plan users to ensure what is proposed in the plans is workable.
S246.017	General comments	General comments - definitions	Not Stated	Supports inclusion of terms of terms such as containment standard, core allocation, hydrological control, impervious surfaces, stormwater catchment, stormwater treatment system, wastewater network catchment and wet weather overflows.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S246.018	2 Interpretation	Containment standard	Support	Considers enforcing the wastewater wet weather containment provisions in PC1, progressively reducing the frequency and/or volume of wet weather overflows is a priority in terms of the intent of the NPS-FM and meet the community values and objectives of PC1.	Replace "achieved" with "be less than".
S246.019	3 Objectives	Amendments to Chapter 3 - Objectives	Support	Is pleased to see the amendments to Chapter 3 (Objectives) includes tables listing quantifiable measures for contact recreation, Māori customary use, aquatic ecosystem health and mahinga kai objectives. Considers including numerical values for macrophytes, periphyton, biomass, invertebrate, fish and mahinga kai species in rivers, streams and lakes is a smart way of demonstrating achievement of the first priority of Te Mana o te Wai.	Not stated
S246.020	3 Objectives	Objective O18: Rivers, lakes, natural wetlands and coastal water are suitable for contact recreation and Māori customary use.	Support	Support the changes to expressly list the type of water body (rivers, lakes, natural wetlands and coastal water) and the activities these are suitable for (contact recreation, Māori customary use, mahinga kai, biodiversity, and aquatic ecosystem health).	Not stated
S246.021	3 Objectives	Objective O19: Biodiversity, aquatic ecosystem health and mahinga kai in fresh	Not Stated	Support the changes to expressly list the type of water body (rivers, lakes, natural wetlands and coastal water) and the activities these are suitable for (contact recreation, Māori customary use, mahinga kai, biodiversity, and aquatic ecosystem health).	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		water bodies and the coastal marine area are safeguarded.			
S246.022	3 Objectives	Objective O25: Outstanding water bodies identified in Schedule A (outstanding water bodies) and their significant values are protected and restored.	Not Stated	Support the changes to expressly list the type of water body (rivers, lakes, natural wetlands and coastal water) and the activities these are suitable for (contact recreation, Māori customary use, mahinga kai, biodiversity, and aquatic ecosystem health).	Not stated
S246.023	4 Policies	4.9.1 Discharges to land and water.	Amend	Not stated	Include a bullet requiring reticulated networks to be compliant with the DIA's National Transition Unit's National Engineering Design Standard.
S246.024	5.4 Beds of lakes and rivers	5.4.4 Uses of beds of lakes and rivers general conditions.	Amend	Questions whether this should be re-written to allow ponding above an intake and encourage a making room for rivers approach. Notes such an approach is only encouraged where appropriate and doesn't increase flood inundation risk to people, property or infrastructure. Considers making room for water allows land to flood safely, while providing a range of benefits such as aquatic and riparian habitat,	Amend to allow ponding above an intake and encourage a making room for rivers approach.

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				wetland restoration, carbon sequestration and increased groundwater recharge. It also offers to restore mana whenua connections with their local water. Where streams, wetland and floodplain remain in natural state, they should be prioritised for protection and providing natural hazard mitigation.	
S246.025	6 Other methods	Method M36: Freshwater Action Plan programme.	Support	Welcomes that FAP must recognise the value and necessity of integrated management planning and delivery but suggest it is unfortunate that the first iteration of Freshwater Action Plans, to cover all rivers and lakes in the Whaitua Te Whanganui-a-Tara, will only be completed by December 2026.	Adopt the process Northland Regional and Auckland Councils have taken to include costed actions plan programmes in the consultation documents for the Long-term Plan process. Amend the FAP Necessary action 4 (a) to include Ministers for Building Innovation and Employment to promote source control for copper and zinc from buildings.
S246.026	6 Other methods	Method M43: Supporting the health of urban waterbodies.	Not Stated	Notes PC1 rules and policy must be aligned with national direction and standards and there is work going on across legislative programmes, regulatory frameworks and infrastructure planning which will influence GWRC plans, compliance and enforcement. Supports the partnership with Wellington Water Limited approach in Method M43. Notes, in relation to clauses (b)(i)(2) and (b)(iii) that new developments are increasingly being required to include stormwater capture and retention but these systems can become a public health risk if not managed properly, and poorly designed systems can cause ponding and flooding. Notes some councils have developed performance criteria and identified acceptable solutions, such as Wellington Water and Auckland Council. Considers a standardised approach would lead to certainty for designers, planners and inspectors and significant cost and resource savings all round.	Recommends that GWRC engage with, but not limited to the water regulators, Taumata Arowai and Commerce Commission, and Te Waihanga Infrastructure Commission Recommends that GWRC through Te Ura Kahika, with Taumata Arowai, the Ministry for Building, Innovation and Employment and Ministry for the Environment develop draft standard consent conditions or verification methods for on-site stormwater device design, construction, maintenance and on going compliance and a good practice stormwater storage volume or device sizing calculation tool
S246.027	6 Other methods	Method M45: Funding of wastewater and stormwate	Support	Supports the addition of Method M45. Appreciates that a new, financially sustainable, funding model for water services delivery is needed and arrangements which avoid an investment hiatus, and enable a well-defined, committed, and funded	Add the economic and Taumata Arowai and the Commerce Commission into this method.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		r network upgrades		pipeline of work will help the delivery of safe and environmentally appropriate water services.	
S246.028	8 Whaitua Te Whanganui-a-Tara	Rule WH.R14: Wastewater network catchment discharges - restricted discretionary activity.	Support	Supports the general intent of the rule but makes suggestions regarding the approach to progressively reduce and remove wastewater network catchment discharges. Notes reducing wastewater volume must be in accordance with the principles of the waste hierarchy (avoid, reduce, reuse, recycle) limiting the amount of water taken at source, how water and by products are used -and reused- within a catchment, targeted water loss strategy and the wastewater, and by products, reuse. Considers clause 6 should include population decrease as a matter for discretion not just growth as there are public and environmental health risks to wastewater from decreasing population. A decreasing rating base also impacts the ability to deliver or fund planned infrastructure programmes and meet new environmental regulations.	Amend clause 6 to include population decrease as a matter for discretion
S246.029	8 Whaitua Te Whanganui-a-Tara	Rule WH.R16: All other discharges of wastewater - non-complying activity.	Oppose	Notes concerns with Rule as interpreted as preventing any new WWTP to be built, and not just those that discharge to water. Considers this will have implications for urban growth in a catchment, which would be contrary to the Wellington Regional Growth Framework (WRGF) spatial plan for an additional 200,000 people in the next three decades.	Reconsider this rule.
S246.030	8 Whaitua Te Whanganui-a-Tara	8.3.7 Take and use of water	Support	Generally support the rules in Schedule P (Efficient use). Notes any directions for freshwater allocation need to be aligned with the Te Mana o Te Wai hierarchy of obligations and water allocation needs to consider water use in the catchment as water leaks and unaccounted for water can increase the water take, which will affect the health and wellbeing of a river or aquifer and the first obligation of Te Mana o Te Wai.	Include an enabling framework for allocating freshwater in the PC1, that incentivises efficient water use within a catchment.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S246.031	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Support	Generally supportive of policy and the clauses to achieve the policy.	Not stated
S246.032	8 Whaitua Te Whanganui-a-Tara	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Not Stated	Generally supportive of policy and the clauses to achieve the policy.	Not stated
S246.033	9 Te Awarua-o-Porirua Whaitua	Policy P.P8 Avoiding discharges of specific products and waste.	Amend	Supports controlled discharges to land, but notes swimming and spa pool water can contain chemicals such as chlorine and copper to kill bacteria and/or algae and if discharged into stormwater systems or freshwater, this treated water has the potential to harm, even kill, fish and other aquatic life.	Add a provision **"Wherever possible, a swimming or spa pool, should drain to the public wastewater system".**
S246.034	9 Te Awarua-o-Porirua Whaitua	Policy P.P10: Managing adverse effects of stormwater	Support	Welcomes that the lifecycle management and funding requirements of water infrastructure to maintain operability is taken into account in P10 (iv). Concerned as to how GWRC will monitor and ensure compliance with this clause, including whether they require regular and ongoing inspection	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discharges.		reports and funding plans demonstrating compliance.	
S246.035	8 Whaitua Te Whanganui-a-Tara	Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy.	Not Stated	Notes copper and zinc are introduced from building materials as well as the use of roads and it will be extremely difficult to separate out different contributing land uses introducing contaminant load into a stormwater system. Considering transport networks as a discrete system will be challenging in terms of design standards, operations and managing and consenting.	Not stated
S246.036	9 Te Awarua-o-Porirua Whaitua	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Not Stated	Notes copper and zinc are introduced from building materials as well as the use of roads and it will be extremely difficult to separate out different contributing land uses introducing contaminant load into a stormwater system. Considering transport networks as a discrete system will be challenging in terms of design standards, operations and managing and consenting.	Not stated
S246.037	12 Schedules	Schedule 30: Financial Contributions.	Support	Supports the approach proposed for financial contributions. Considers this is a smart way to mobilise the transformation and transition to water sensitive, nature based water management, and there are interrelated benefits including for mana whenua values, quality of urban life, freshwater rules compliance, adaptation to climate crisis, sequestration and affordability to the community.	Clarify if consideration been given for the contributions to fund ongoing operation and maintenance and depreciation of these stormwater treatment systems. Clarify if the relevant stormwater network utility operator will undertake the capital expenditure work and inherit the treatment systems.
S246.038	12 Schedules	Schedule 32: Wastewater Network Catchment	Oppose	Considers the requirement for 'a proactive programme of maintenance and renewals of the public wastewater network infrastructure to improve pipe condition, inflow and infiltration management, and reduces pipe failures as a result of blockages	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Improvement Strategy.		within the network or due to aging infrastructure" describes an asset management plan (AMP). The information to be included by the PC1 objectives in schedule 32 are integral parts of AMPs, generally produced in accordance with ISO 55000:2014 Asset management. AMPs are required by the Local Government Act 2002, and which are audited by Audit New Zealand, and shortly will be required by Commerce Commission, under the Water Services Entities Act 2022.	
S246.039	6 Other methods	Method M36: Freshwater Action Plan programme.	Support	Supports in terms of giving effect to Te Mana o te Wai, notes an error in the numbering, and believes this clause 6.16 should be 6.18.	Not stated
S246.040	12 Schedules	Schedule 27: Freshwater Action Plan requirements.	Not Stated	Welcomes that FAP must recognise the value and necessity of integrated management planning and delivery but suggest it is unfortunate that the first iteration of Freshwater Action Plans, to cover all rivers and lakes in the Whaitua Te Whanganui-a-Tara, will only be completed by December 2026.	Adopt the process Northland Regional and Auckland Councils have taken to include costed actions plan programmes in the consultation documents for the Long-term Plan process. Amend the FAP Necessary action 4 (a) to include Ministers for Building Innovation and Employment to promote source control for copper and zinc from buildings.

S198 Wayne Bettjeman

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S198.001	General comments	General comments - overall	Not Stated	Supports the submissions of the New Zealand Farm Forestry Association Inc, and the Wellington Branch of the New Zealand Farm Forestry Association.	Not Stated

S118 Wayne Robert Pettersson and Maureen Pettersson

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S118.001	General comments	General comments - overall	Not Stated	Considers language used in Whāita The Whanganui-a-Tara and the___14 Avarua-o-Porirua Whāita documents is difficult to understand.	Not stated.
S118.002	General comments	General comments - consultation	Not Stated	Considers the consultation with affected parties regarding the plan change has been poor. Concerned the proposed plan is aimed at small block owners and there is no evidence or proof they are a problem.	Not stated.
S118.003	General comments	General comments - overall	Not Stated	Considers the problems leading to the plan change result from large intensive farming and logging operations carried out within catchment areas not small blocks.	Not stated.
S118.004	General comments	General comments - overall	Not Stated	Considers the stream on personal property has not had any erosion problems.	Not stated.
S118.005	General comments	General comments - overall	Not Stated	Concerned about costs and practicalities of having to fence off streams.	Not stated.
S118.006	General comments	General comments - overall	Not Stated	Submitter strongly opposes PC1.	Suggests GW provide financial help for fencing, water troughs, pipe and fittings and a water tank. Suggests GW be responsible for maintenance of the fenced off stream area.

S036 Wellington Branch of New Zealand Farm Forestry Association

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S36.001	General comments	General comments - overall	Not Stated	Supports submission from the national body of NZFFA.	Not stated
S36.002	General comments	General comments	Not Stated	Notes the new government has announced intentions to review the NPS-FM and related	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		- current legislation		legislation and the plan change needs to maintain consistency with revised objectives.	
S36.003	13 Maps	Map 90: Highest and high erosion risk land (Pasture) - Te Awarua-o-Porirua.	Not Stated	Considers the identified risk is relative and does not address the objective risk of sediment reaching water bodies. Considers the maps should not be used as a criterion to prohibit plantation forestry.	Not stated
S36.004	13 Maps	Map 93: Highest and high erosion risk land (Pasture) - Te Whanganui-a-Tara.	Not Stated	Considers the identified risk is relative and does not address the objective risk of sediment reaching water bodies. Considers the maps should not be used as a criterion to prohibit plantation forestry.	Not stated
S36.005	General comments	General comments - overall	Not Stated	Notes the proposed approach to prohibit production forestry from 10% of the steepest forestry land is based on catchment modelling, on the assumption that the steepest land delivers the most sediment to waterways via landslides. Concerned this approach is not based on objective evidence, does not consider other sources of sediment, and the approach is inconsistent with forestry best practice guidelines and scientific literature on forestry erosion.	Not stated
S36.006	General comments	General comments - plantation forestry	Not Stated	Considers the prohibition of plantation forestry from the highest 10% relative Risk of Erosion Prone Forestry Land does not stack up and may not reduce sediment levels in water bodies.	Not stated
S36.007	General comments	General comments -	Oppose	Considers making all forestry operations a controlled activity is draconian and is not supported by evidence.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		plantation forestry			
S36.008	General comments	General comments - current legislation	Not Stated	Notes a new version of the NES-CF is in force and has stronger environmental controls.	Not stated
S36.009	General comments	General comments - target attribute states	Oppose	Concerned the TAS erroneous and have been propagated throughout PC1 as justification of the need for more control over plantation forestry, noting that pastoral farming is not subject to controlled activity.	Not stated
S36.010	General comments	General comments - current legislation	Not Stated	Considers GW should allow the new NES-CF to bed in and actively monitor compliance and land performance (commission research) and withdraw the prohibition on harvest in the meantime. Failing this, the submitter considers GW should exempt forestry under 20ha as a Controlled Activity.	Withdraw the prohibition on harvest. Should the above relief not be granted, exempt forestry under 20ha as a controlled activity.
S36.011	General comments	General comments - plantation forestry	Not Stated	Considers GWRC should ask for ESC data used by NES-CF to be reviewed and make a technical case if Wellington, Hutt Valley and Porirua have an erosion risk severe enough to warrant banning plantation forestry (red zoned land). Notes national consistency on this matter is desirable.	Not stated
S36.012	General comments	General comments - overall	Not Stated	Concerned PC1 lacks input from experienced soil conservators and questions why they were not consulted. Considers a tunnel-view solution is proposed for a problem that may not exist.	Rather than prohibit Plantation Forestry from the steepest slopes, explore other ways of mitigating the risk of erosion from steep slopes after harvesting.
S36.013	General comments	General comments - current legislation	Not Stated	Considers the regulations in the NES-CF are sufficient to minimise negative environmental effects of plantation forestry on water bodies, noting the NES-CF has sound scientific backing. Considers conditions that are more stringent than the NES-CF should be based on compelling evidence about the scale of the problem, including the source of pollutants and that current rules are not working.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S36.014	General comments	General comments - plantation forestry	Not Stated	Concerned about aspirational targets becoming regulation in PC1 and questions whether this is fair and reasonable. Notes plantation forestry historically does not compete for highly productive land used for food production, but rather occupies low fertility and more erosion prone hill country and the avoided erosion, carbon services and other ecosystem services provided by plantation forestry are highly valued. Considers the requirement under the NPS-FM for plantation forestry to release no more sediment to water bodies than existed in the natural state is unrealistic. Notes erosion events will be more frequent and intense due to climate change. Concerned PC1 will set a precedent in NZ and the proposed peak sediment discharges of only 100g/m3 , high compliance costs, certification of plans, auditing, and the inability of current forestry best practise and technology to deliver desired outcomes, the regulations could put plantation forestry in hill country out of business. Concerned clause 1.3.5(c) of the NPS-FM is being overlooked in favour of an unrealistic vision for the health and wellbeing of waterbodies.	Not stated
S36.015	General comments	General comments - plantation forestry	Oppose	Considers PC1 proposals are naïve about the implications for plantation forestry, ill thought out and subject to unintended consequences. States there is no evidence presented that retiring out the steepest ('most erosion prone') plantation forest land will improve sediment outcomes in waterways and leakage of sediment could get worse if management practices have to change.	Not stated
S36.016	General comments	General comments - plantation forestry	Not Stated	Considers most sediment arising from plantation forestry operations in Wellington is from roading, skid sites/track making and skidding logs, and stream/river scouring, despite contractors following best practice guidelines. Notes the region has few landslides in forested areas, even after harvesting. Notes larger operations using haulers are designed	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				and operated in accordance with best practice guidelines, and earthworks are minimised on steepest slopes. Considers "high risk erosion prone" slopes do not contribute much sediment to water bodies in well managed forests. Considers under extreme weather events, and time averaged over the life cycle of the forest, steep slopes are comparable to those under continuous native bush cover.	
S36.017	General comments	General comments - plantation forestry	Not Stated	Notes there are no studies that measure the amount of sediment from forestry operations in the Whaitua Te Whanganui-Tara or Te Awarua-o-Porirua Whaitua. Modelling that has occurred is based on broad assumptions. Considers Wellington forests have minimal erosion problems and therefore have not been closely studied, and science work has been focused on highly erosion prone land in other areas, which are subject to orange and red zoning under the NES-CF. Notes no such land classes are present in the Whaitua Te Whanganui-a-Tara or Te Awarua-o-Porirua Whaitua. Notes GW have not sought professional forestry or soil conservator advice. Considers some policies are based on models of erosion risk rather than real data. Considers it is not possible to allocate equitable contributions to reducing sediment loads without data on the relative contributions of sediment from natural sources, forestry, pastoral farming and urban/roading development.	Not stated
S36.018	General comments	General comments - water quality improvements	Not Stated	Considers there is no indication in GW's water quality data of increased sediment in catchments with a high proportion of plantation forestry. Notes the water clarity of Mangaroa River exceeds guidelines, the TAS set by the NPS-FM, but the test result in this case is an inappropriate surrogate measure for suspended solids and the test failure was due to a natural source of brown water.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Disputes the values for required sediment load reductions in Table 8.5 for Mangaroa River, and suggests the data interpretation for Wainuiomata/Black Creek is incorrect. Notes the NPS-FM acknowledges that natural sources of brown water exist and allows different TAS to be set accordingly, which has not been done for Mangaroa and potentially Wainuiomata/Black Creek, although it has been done for Hulls Creek. Concerned that the TAS values listed for Hulls Creek, Mangaroa and Black Creek appear to be default values from the tables and not adjusted to baseline values or reset by GW. In the case of Hulls Creek, the submitter is not aware that this drains a peat swamp and suggests buried iron adjacent to the railways activities is the source of the opalescent water (references photo in original submission).	
S36.019	General comments	General comments - plantation forestry	Not Stated	Notes a report commissioned by Whaitua Te Whanganui-a-Tara which indicates that deposited fine sediment levels was low in some rivers with extensive plantation forestry, and that fine sediment was not significantly impacting ecosystem health. Suggests relatively high levels of fine sediment downstream in the Hutt River are a result of bulldozer activity from flood protection works, rather than from upstream farming, urban earthworks or forestry activity. Notes current GW data for the Hutt Valley sub-catchments with high levels of plantation forest do not indicate elevated levels of deposit fine sediment.	Not stated
S36.020	General comments	General comments - maps	Not Stated	Concerned the maps (based on mapping by Easton) identifying the highest risk erodible land for pastoral, woody vegetation and plantation forestry land are based on an assumption that bare land after clear-felling will have a risk of erosion similar to pasture and there is a significant window of vulnerability after harvest. Considers this risk is	Commission a technical review of the mapping by Easton et al.

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				overstated as roots and minor debris armour the slope for a period and there are ways of mitigation erosion risk after harvest. Notes forestry land is only in a more vulnerable state (after harvest) about 10% of the time and should be regarded as if it was permanents woody vegetation, not pasture or bare soil. Considers the mapped erosion risk is relative rather than absolute, and does not account for underlying geology/lithology, roadworks, soil disturbance and forestry related activities as a potential source of sediment. Notes the mapping uses a 5m resolution, which is higher than the NES-CF and much of the highest risk erosion prone areas identified by Easton are so large that, had they qualified as Red Zone, the NES-CF/ESC resolution would have picked them up. Notes the C factor identified for the maps, and disagrees that pasture is only twice as susceptible to erosion as woody vegetation and that otherwise undisturbed bare earth (with or without roots) should not be 10 times worse than pasture. Considers the Risk of Erosion model is not nearly as sophisticated as that used to calculate Erosion Susceptibility Classes (ESC) for the NES-CF. References earlier mapping (2012) that considered the risk of pastureland slipping into water bodies. References Stats NZ Highly Erodible Land maps. Notes several researchers who state that shallow landslides often do not reach waterbodies and most of the material is retained on site as talus, particularly on sites with woody vegetation. Considers the mapping contracted to Easton et al did not consider the risk of sediment actually getting into waterbodies.	

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				Concerned the identified land parcels do not take into account the underlying lithology and Land Use Class Categories as is done for Erosion Susceptibility Classification used by NES-CF, which is intended to reflect an absolute risk of erosion. Considers the approach used by Easton et al, and data produced should be subjected to expert technical review.	
S36.021	General comments	General comments - plantation forestry	Not Stated	Notes NZ literature which indicates Wellington has relatively stable hill country soils which are desirable for forestry operators. Considers the risk of landslide for Wellington, Porirua, and Hutt Valley soils is lower than for unreinforced bare soil.	Not stated
S36.022	General comments	General comments - plantation forestry	Not Stated	Notes bare land in a harvested pine forest, whilst not having a canopy to intercept rainfall, does not behave like unprotected bare soil. Notes there is no specific data differentiating various sources of sediment in Wellington water bodies. Considers to understand the implications of potential solutions for forestry, there should be breakdown of sediment yields between soil disturbance factors, at different stages of the forestry cycle. Considers urban and pastoral land cover classes are worse than predominantly plantation forestry catchments and native catchments.	Not stated
S36.023	General comments	General comments - plantation forestry	Not Stated	Notes a Hawke's Bay study which suggests forestry performed better than adjacent pasture, and that earthworks including road making was a substantial contributor to sediment in the stream. Suggests that slips on steep land under periodic forestry cover are not a major source of suspended sediment. Notes another study that risk of shallow slips on non-wooded greywacke steep slopes is less than for other soil types. Suggests GW obtain data on shallow landslide incidence after harvest from their own forests to determine if retiring steepest slopes from forestry impacts sediment in water bodies.	GW commission or obtain live data about shallow landslide incidence after harvest from their own extensive forests to see if retiring out steepest slopes from forestry could actually make a significant difference to sediment in water bodies.

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S36.024	General comments	General comments - plantation forestry	Not Stated	Considers the expectation in PC1 for plantation forestry to produce little more sediment than the same catchment would under natural cover is unrealistic with current land-based harvesting and stem/log transport technology. Notes pastoral, intensive farming, horticulture and arable/market gardening do not seem to be held to the same expectation. Considers sediment production from the natural state is not well quantified and achieving sediment rates close to the natural state is an unrealistic goal that does not take into account climate change, effects of earthquakes and volcanic eruptions, land use changes and clearance and other natural dynamics over the last 1000 or more years. Considers there is little awareness of recent 'natural' sedimentation dynamics (e.g. influence of feral animals, deer, goats, pigs) or increases in sediment from unmodified natural catchments. Notes natural sediment levels of any particular waterway will depend on stream size and water volume, steepness, state of vegetation cover, input from mineral rich seepages and iron and other mineral oxides can be a major portion of sediment and turbidity nea the sources of these seepages. Notes water quality is only routinely monitored at a few readily accessible sites low down in the catchment. Questions what 'natural state' means in relation to managing forestry sediment loss. Is it a waterway in the foothills surrounded by climax bush (undisturbed by ungulates), a water body flowing from a recently regenerating seral forest as covers much of the Wellington hill country and heavily browsed by pest ungulates (goats, deer,	Not stated

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				pigs), or is it only defined at the few official monitoring points low down in a catchment area? Questions how individual land managers up-stream can be individually be held accountable if natural state and TAS can only be determined at defined regular monitoring sites. Questions whether TAS are realistic and if they take into account dynamics of natural systems including increased erosion caused by climate change or earthquakes.	
S36.025	General comments	General comments - plantation forestry	Not Stated	Considers it unreasonable to set worst case stormwater sediment discharges for forestry cycles as if they operate at the same frequency each year, or with every rain event. Considers it more equitable to time-average discharge limits for forestry over a 25-35 year period. Considers insufficient understanding is demonstrated in PC1 of sediment loss to waterways within a cyclic forestry environment. Considers the peak point source sediment limits of 100g/m3 is unrealistic. Considers it better to define forestry best practice and audit to those standards.	Not stated
S36.026	General comments	General comments - plantation forestry	Not Stated	Notes data is needed to determine where sediment is coming from. However, considers forestry earthworks, including roading and associated batters, culverts, stream crossings, use of skidders, for plantation forestry near Upper Hutt are much more frequent and significant sources of sediment than shallow land slide and surficial erosion from steep slopes after tree harvest. States this view is supported by the Hawkes Bay Pakuratahi Paired catchment report, (Eyles). Notes Natural State sediment contributions can be significant. Considers forestry roadworks and associated harvesting earthworks can generally be managed to minimise but not eliminate sediment loss to	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				waterways, but rather than focus on extremely conservative peak discharge limits, the sediment losses over the whole forestry cycle need to be factored in. The submitter has not observed evidence that steep slopes are producing significant areas of shallow landslides (Upper Hutt area). Suggests Greater Wellington produce evidence from their own forests (rather than rely on dubious modelling).	
S36.027	General comments	General comments - plantation forestry	Not Stated	Considers that if plantation forestry were prohibited from "highest risk erosion prone" slopes, that after harvesting, regeneration of pine, gorse and other weeds would be likely, and that regeneration of native vegetation is unlikely. Notes the potential for large scale wilding pines. Notes tree toppling on managed sites could generate sediment. Considers retiring of steepest land will affect the viability of current forestry operations. Noting that if cable harvesting can no longer be undertaken due to mid-slopes no longer having plantation forestry, then machine access must be along low-lying territory with more crossings of streams and seepages, thereby exacerbating sediment and erosion issues.	Not stated
S36.028	General comments	General comments - plantation forestry	Not Stated	Considers the performance requirements for woody vegetation replacing pastoral land is a low expectation compared to performance of exotic timber species in managed plantations, and does not meet ETS performance standard for pre-1990 forestry succession. Considers there is potential to improve carbon sequestration by encouraging managed exotic forestry species. Suggests rather than banning production forestry from steepest slopes, consider alternative timber species, permanent forestry, carbon forestry continuous cover forestry / close to nature forestry to reduce risk of sediment loss.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S36.029	General comments	General comments - plantation forestry	Not Stated	Considers there will be unintended consequences from prohibiting plantation forestry from steep slopes as it will alter the forestry management plans as production forests may then be restricted to broad ridge lines and lower slopes/valley floors. Sediment discharges from forestry roading and tracks may also get worse. Notes if cable logging cannot be undertaken, there may be an increased use of ground-based log transport which uses heavy machines on soft temporary tracks rather than on engineered and metalled roads creating more soil disturbance and soil compaction than that caused by cable logging. Considers more stream crossing and seepage crossing, and faster and heavier runoff flows from the upper slopes will also impact earthworks and in the narrow valleys there is often limited space available to install structures to manage sediment near waterways. Concerned larger areas of land than mapped will become uneconomic to grow and harvest trees from, individual parcels will not longer be able to operate and may not be eligible to join an ETS which could trigger claims for compensation or a RMA section 85 claim. Notes pastoral farmers have been encouraged to use plantation forestry (as well as permanent forestry and native revegetation) for Government sponsored Hill Country Erosion programmes, other subsidised planting schemes (e.g. Billion Trees) as well as offsetting livestock GHG emissions. Concerned the prohibition of plantation forestry on steep slopes will significantly reduce their options. Considers it is likely after harvesting erosion prone land landowners will allow natural regeneration to	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				occur rather than replanting which will invariably be dense groves of pine seedlings which quickly achieve canopy coverage, but will grow tall and thin and be subject to disease, stem breakage and toppling in storms. Notes as wilding pines get older, they will produce large amounts of seed and there is likely to be a public backlash about a perceived wilding pine problem. Questions who will be accountable for this problem. Cites former GW soil conservator assertion that radiata pine needs active management and is not a suitable species for unmanaged stands.	
S36.030	General comments	General comments - plantation forestry	Not Stated	Considers there are many alternative solutions to mitigate the risk of sediment loss from steep slopes and the production forestry ban will undermine research into improved technologies for harvesting and silviculture on steep slopes. Cites the following examples of alternatives: - Panpac's method of re-grassing or sowing a cover crop immediately after harvest which greatly reduces surficial runoff and would enable use of selective herbicides to reduce woody regrowth (pines/gorse etc) later and prior to replanting in crop trees. - immediate replanting of crop trees in some situations - replanting at higher than usual planting density - lower final stocking rates - impose restrictions on tracking/earthworks on steepest slopes (and/or additional safeguardes to prevent sediment moving offsite. - use of coppicing timber crop species such as poplars, acacia, oak, redwoods and eucalypts. - extend rotation length - alternative harvesting strategies e.g. small coup, strip harvest, selection harvesting. - close to nature (Pro Silva) or Continuous Cover Canopy regimes.	Amend the definition of 'highest risk erodible forest land' by increasing the slope angle to above 30 degrees and taking into account underlying lithology. That the criteria used are technically peer reviewed by industry recognised experts and aligned to observed field data.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Suggests the definition of highest risk erodible forest land can be adjusted by increasing the slope angle to above 30 degrees and taking into account underlying lithology. Considers the criteria used should be technically peer reviewed by industry recognised experts and aligned to observed field data. Prefers the provisions of the NES-CF prevail.	
S36.031	General comments	General comments - plantation forestry	Not Stated	Notes the NES-CF already requires forests have a full cycle plan, including erosion and sediment control plan, available on request, whereas GW are requiring an erosion control plan certified at an early stage, and for the whole forestry cycle to be controlled and consented. Considers the requirement to prepare and consent an erosion plan 30 years ahead of soil disturbance is unreasonable and the NES-CF rules are sufficient. Notes the cost to prepare and certify an erosion plan will not be affordable at a small scale and many years ahead of forestry income, as well as additional burden of preparing a freshwater plan for livestock operations. Considers the cost of certification and prohibition of plantation forestry on steep slopes will disincentivise pastoral farms wishing to use plantation forestry for offsetting for greenhouse gas emissions. Notes NES-freshwater part 2 provisions only apply to pastoral or arable land operations larger than 20 ha.	That forests under 20ha be subject only to NES-CF rules (permitted activities) and be exempt from GW controlled activity consenting, noting GW can still be notified of harvesting or soil disturbance near water bodies as allowed for in the NES-CF.
S36.032	General comments	General comments - plantation forestry	Not Stated	Considers the s32 report cost/benefit assessment lacks logic and underestimates financial impacts. Considers the greater than 10% of land taken out of production forestry will have long-term impact, undermine confidence in plantation forestry, and will reduce the benefits of plantation forestry. Notes the desire for equitable processes to achieve the TAS and this should not be about everyone adjusting by an equal amount but about quantifying the problem and minimising environmental risk by targeting the highest contributors of sediment. Questions the	Not stated

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				equitability of the TAS, noting forestry is a controlled activity but not pastoral farming when the literature indicates pastoral farming activities are far more likely than forestry to release sediment and other contaminants into waterbodies.	
S36.033	General comments	General comments - plantation forestry	Not Stated	Considers the majority of published evidence shows plantation forestry is much better than pastoral farming in highly erodible zones in relation to soil disturbance and sediment runoff. Notes some sensitive harbours and estuaries are silting up but we don't know the relative contributions from Wellington area forestry vs natural or other land activities. Considers the case put forward by GW is weak, based on a false premise that steepest forestry land will deliver most of the sediment and some of the evidence (visual clarity and sediment yields) is factually incorrect. Notes the NES-CF has been revised with tighter controls and has only just been implemented. Concerned there are serious errors in the assigned TAS values. Considers the gravity of the situation does not warrant overriding the NES-CF and it is unknown whether the original NES-PF had any effect. Notes available data suggests deposited fine sediment in some forestry catchments has improved since 2013-2015. Concerned the rules are being tightened instead of undertaking enforcement.	Not stated
S36.034	General comments	General comments - plantation forestry	Not Stated	Considers the concern that increasing forestry operations will worsen sediment does not account for a number of factors, including: earthworks are often one-off and done at the end of the forest cycle; improvements in harvesting technology; reductions in manual tree falling; the potential for airship assisted harvesting; and improved tools to	Not stated

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				identify and manage sensitive areas. Suggests sensitive erosion prone areas should be identified and micromanaged.	
S36.035	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Support	Not stated	Not stated
S36.036	8 Whaitua Te Whanganui-a-Tara	Objective WH.O2: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora.	Amend	Considers use of baseline data or other agreed TAS, rather than natural state, is more realistic.	That GW and others find a better way of defining natural levels.
S36.037	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute	Not Stated	Notes the use of the suspended fine sediment/visual clarity/black disc test for Mangaroa River does not take into account that Black Stream (natural brown water) drains into Mangaroa River.	Confirm different TAS have been set where there are natural sources of brown water.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		states for rivers.		Seeks confirmation that different TAS have been set where there are natural sources of brown water. Notes the Total Suspended Solids and suspended fine sediment and deposited fine sediment results are high quality, so are at odds with the Visual Clarity result (refers to table in original submission). Seeks confirmation that Wainuiomata/Black Creek has an appropriate TAS set for visual clarity.	Check Wainuiomata/Black Creek has appropriate TAS set for visual clarity.
S36.038	8 Whaitua Te Whanganui-a-Tara	Policy WH.P4: Achievement of the visual clarity target attribute states.	Not Stated	Considers the target for Mangaroa is based on inappropriate TAS, noting the clarity required is affected by naturally occurring input from a major peat swamp. Challenges the value for Wainuiomata urban stream/Black Creek, noting it may also be subject to Natural Brown Water.	Alter the TAS
S36.039	8 Whaitua Te Whanganui-a-Tara	Policy WH.P26: Managing livestock access to small rivers.	Amend	Considers the clarity test for Mangaroa is affected by stream from a major peat swamp.	Alter the TAS. Move the water monitoring site to above the confluence with Black Stream or reset TAS value; and/or remove mention of Mangaroa River.
S36.040	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Oppose	Considers policy is misguided, noting Wellington, Hutt Valley and Porirua hills are greywacke, with low risk of shallow landslide. Considers no evidence is provided which suggests steepest slopes are a significant source of sediment after forest harvest. Considers earthworks before and during harvest are a more likely source of sediment. Considers withdrawing plantation forestry from steepest slopes could have unintended consequences and increase risk of sediment loss. Notes alternative ways to mitigate risk of sediment loss from steep land.	Delete policy
S36.041	8 Whaitua Te	Policy WH.P30: Discharge	Amend	Notes the rule does not apply to forestry. Considers the peak discharge limit too low and barely colours water. Considers a vehicle driving on a gravel road,	Raise discharge limits to 1000g/m3

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	Whanganui-a-Tara	standard for earthworks.		even with small scale sediment raps in place by a culvert (as per NES-CF) and walking tracks in the Oronogorongo Valley would fail this test.	
S36.042	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance - discretionary activity.	Amend	Considers references to Resource Management (National Environmental Standards for Freshwater) Regulations 2020 should instead refer to NES Commercial Forestry or NES Plantation Forestry.	Replace references to Resource Management (National Environmental Standards for Freshwater) Regulations 2020 with references to NES Commercial Forestry or NES Plantation Forestry.
S36.043	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Amend	Regarding clause (a), questions why high erosion risk pasture does not go straight into plantation forestry, noting that only highest risk slopes were proposed to prohibit plantation forestry. Regarding clause (b), considers it costly to prepare an erosion and sediment control plan, even if no steep erosion prone land is involved or proximity to water bodies. Regarding clause (c), considers the discharge limit of 100g/m3 is impractical for forestry, particularly if landslides are involved. Considers it unreasonable to expect recently cleared slopes to produce no more sediment in water than that emerging from an intact canopy catchment upstream, even with sophisticated sediment controls. Regarding clause (d), considers visual clarity an invalid surrogate measure for suspended solids, noting visual clarity can be affected by peat colour. Seeks the TAS is reviewed and reset to allow for a natural brown water input. Considers it unreasonable to penalise based on visual clarity test results outside of a forestry operator's control. Considers it unclear the effect of escalating plantation forestry to a discretionary activity.	Clause (a): Delete 'high erosion risk pasture' Amend clause (b) to exclude forests less than 20ha and not in red zoned land. Delete clause (c)and use best practise guidelines to control sediment. Delete clause (d). Amend matter of control (1): Do not increase average sediment load between forest lifecycles. Delete matter of control (2).

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				Regarding matter of control (1), notes forest activities with potential to release sediment are not the same every year, and that whole catchments are likely to be harvested concurrently. Regarding matter of control (2), concerned GW officials will determine area, location and methods used. Concerned the clause may prohibit forestry from otherwise suitable land and create health and safety concerns. Concerned GW officials may override appropriate contractor operations.	
S36.044	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry - discretionary activity.	Amend	Considers references to Resource Management (National Environmental Standards for Freshwater) Regulations 2020 should instead refer to NES Commercial Forestry or NES Plantation Forestry.	Replace references to Resource Management (National Environmental Standards for Freshwater) Regulations 2020 with references to NES Commercial Forestry or NES Plantation Forestry.
S36.045	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.	Amend	Considers the clause is too far reaching and is misguided. Concerned the clause assumes that surficial erosion and shallow landslide from the most erosion prone slopes after harvest are the major cause of sediment loss into water bodies, with no evidence to support this. Notes "afforestation" is different from "replanting". Prefers the NES-CF prevails. Suggests a number of other methods to mitigate the risk of sediment loss to water bodies in original submission. Considers a working threshold relating to use of highest risk erosion prone land is required as the grid resolution is only 5m (=25m2) which is not a practical unit for management.	That the NES-CF provisions prevail. Failing that: - remove the word "afforestation" until more research data is available. - Change the clause title to not indicate that plantation forestry is prohibited. - Review policy and engage with forest industry and forest experts. - Land areas with contiguous 'pixels' need to be larger that 1000m2 for the regulations to apply.
S36.046	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Amend	Notes the rule does not apply to forestry. Considers the peak discharge limit too low and barely colours water. Considers a vehicle driving on a gravel road, even with small scale sediment raps in place by a culvert (as per NES-CF) and walking tracks in the Oronogorongo Valley would fail this test.	Raise discharge limits to 1000g/m3

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S36.047	12 Schedules	A2 Freshwater Action Plans required in Whaitua Te Whanganui-a-Tara.	Support	Supports the strategy.	Retain as notified
S36.048	12 Schedules	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Oppose	Considers objective clause Bb unrealistic, noting the NPS-FW defines natural state as about 1000 years ago.	Delete clause Bb
S36.049	12 Schedules	B Management objectives	Support	Considers the objectives unrealistic, noting the natural state is not measurable at a forest or small catchment level. Notes Increased intensity of storm events and feral animals contribute to sediment loss, as well as landslides. Notes forestry harvests typically have a 30-year cycle, with major earthworks being a one-off event. Considers it unreasonable to treat peak sediment loadings as if they occur at the same rate every year. Considers forestry harvest could not achieve the standards without sediment control measures of similar sophistication and scale to state highway roading, noting that rural land uses are not subject to the same expectations. Notes studies which suggest that a full forestry cycle on highly erodible land releases less sediment than pastoral farming. Considers arbitrary limits and unrealistic standards for compliance threatens hill country forestry. Welcomes input from GW on design of sediment control structures that are practical and affordable	Delete Objectives B2 and B3. If the above relief is not implemented: - raise peak discharge standard to 1000g/m3 - amend so forestry sediment discharge is time averaged over the life cycle of the forest.

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				and that can be assessed alongside existing Best Practise Guidelines.	
S36.050	12 Schedules	C1 Contents of the Erosion and Sediment Management Plan	Oppose	Considers larger forestry operators with professional advisors may be able to comply with the requirements, but not smaller operators, especially if highest risk or erosion prone land does not exist in their forest. Considers no justification is provided that the NES-CF will not deliver satisfactory outcomes. References the alternative methods set out elsewhere in submission to mitigate sediment loss from steepest slopes within forestry. Notes potential amendments to address alternative species, alternatives harvest techniques, and variations on permanent forest where partial harvesting is allowed.	Withdraw Schedule 34. Failing that: Amend clause to not exclude afforestation/plantation forestry from steep land. Exclude woodlots covered by NES-CF, less than 20ha, and not containing red zoned land from controlled activity status; or default to NES-CF provisions. Provide exemptions from registering a full cycle plan and certified erosion control plan where: -small remnants of forest remain to be harvested, but where replanting is not intended e.g. for harvest operations to wind up within 30 years; or -where forest operations are less than 20ha.

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Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S33.001	General comments	General comments - overall	Not Stated	WCC has practical constraints in managing its three waters network. Funding constraints will make it difficult to achieve significant improvements quickly, and the target attribute timeframe of 2040 is unlikely to be practicably achievable. Considers a 2060 target is more realistic but this would also be challenging to achieve due to financial constraints and limited capacity within the infrastructure sector to deliver upgrades.	Not stated
S33.002	General comments	General comments - urban development	Not Stated	Significant infrastructure upgrades are required to meet projected urban growth demand. These upgrades will be expensive and take years to complete. A long-term approach will be required to	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				renew existing assets and achieve both urban growth and water quality outcomes.	
S33.003	General comments	General comments - water quality improvements	Not Stated	WCC is already engaging in multiple statutory and non-statutory processes in processes to achieve water quality improvements. Water quality improvements will be difficult to achieve due to design and construction of existing three waters infrastructure, and constrained resources of local government. Concerned that NRPC1 would require all brownfield development to seek consent for stormwater discharges from both District and Regional Councils, which is an unnecessary duplication.	Not stated
S33.004	General comments	General comments - unplanned greenfield development	Not Stated	Concerned about the practical implications and unintended consequences of unplanned greenfield development being a prohibited activity. Considers this will affect WCC's ability to make strategic decisions on growth and development without a change to the District and Regional Plan, and difficulties with minor changes to urban zoning. Considers the prohibited status has not been reasonably justified, and that alternatives that could achieve the strategic intent of the rule without requiring a dual plan change process, such as a Discretionary Activity status, should be considered.	Not stated
S33.005	General comments	General comments – stormwater management	Not Stated	Concerned the proposed framework for managing the effects of stormwater runoff from development is already regulated through the PDP, and this would lead to applicants going through two different consenting processes. Suggest stormwater runoff from development is better regulated at the District level.	Not stated
S33.006	2 Interpretation	Dry weather discharges	Neutral	Consistent with Wellington Water definition.	Retain as notified
S33.007	2 Interpretation	Earthworks	Support	Consistent with the WCC PDP definition of earthworks	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S33.008	2 Interpretation	Environmental outcomes	Support	Support the requirements for environmental outcomes	Retain as notified
S33.009	2 Interpretation	Existing wastewater discharge	Oppose	Consider the definition confusing and recommend refining the definition and referencing s124 of the RMA.	Amend to clarify definition
S33.010	2 Interpretation	High risk industrial or trade premise	Amend	Considers that the lack of metrics associated with the subclauses means it is unclear what would be captured by the associated rule framework i.e. it is unclear what 'bulk storage' could be considered as.	Amend to clarify scale or metric thresholds where regulation of activities would be triggered.
S33.011	2 Interpretation	Hydrological control	Oppose	Consider the proposed definition describes discharges, as set out under s15 of the RMA, and does not demonstrate how hydrological controls manage stormwater runoff.	Amend definition as follows: Hydrological control: means the management of a range of stormwater flows and volumes, and the frequency and timing of those flows and volumes, ~~from a site or sites~~ **through** on site management ~~processes for the purpose of reducing bank erosion, slumping, or scour, to protect fresh water ecosystem health and well being.~~
S33.012	2 Interpretation	Impervious surfaces	Oppose	Definition is complex and difficult to implement. The use of impermeable surfaces (permeability) is also a matter of consideration for District Plans as set out in 80E of the RMA and 3.5(4) of the NPS-FM.	Delete definition
S33.013	2 Interpretation	Redevelopment	Oppose	The proposed definition is unreasonable and is not taking into consideration the environmental pressure of the urban environment. Overlaps with the functions of territorial authorities and the consideration for stormwater management as set out in 80E of the RMA and 3.5(4) of the NPS-FM. Does not promote integrated management.	Delete definition
S33.014	2 Interpretation	Stormwater catchment or sub-catchment	Support	Supports the use of stormwater catchments into rivers, lakes, wetlands, springs, riparian margins, and other receiving environments	Retain as notified
S33.015	2 Interpretation	Stormwater managem	Support	Support stormwater management strategies and considers them the most appropriate tool for the management of stormwater contaminants for local authority or state highway stormwater networks.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		ent strategy			
S33.016	2 Interpretation	Stormwater network	Support	Considers it appropriate to consider stormwater treatment systems that serve more than one property.	Retain as notified
S33.017	2 Interpretation	Stormwater treatment system	Amend	Support the definition in principle but considers the definition allows the application to be too broad and overlapping with territorial authority provisions.	Amend so it only applies to discharge outside a local authority or state highway stormwater network.
S33.018	2 Interpretation	Unplanned greenfield development	Oppose	Concerns regarding the prohibitive provisions framework and if it the most appropriate to achieve the objectives and policies of the NPS-FM 2020. Concerned 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. Notes that s3.5(4) NPS-FM only sets direction for District Plans to manage urban development, not regional plans. Considers the prohibited activity status is not justified through the s32 report as the most appropriate option to achieve the objectives of the plan, and that a Discretionary Activity status is more appropriate.	Amend definition to take into account smaller sites within the existing urban boundary or delete definition.
S33.019	2 Interpretation	Wastewater network catchment or sub-catchment	Support	Consistent with Wellington Water definition.	Retain as notified
S33.020	2 Interpretation	Wet weather overflows	Support	Consistent with Wellington Water definition.	Retain as notified
S33.021	6 Other methods	Method M43: Supporting the health of urban waterbodies.	Amend	Considers it appropriate to develop framework with Territorial Authorities given the District Plan manages urban activities.	Amend as follows: ... Wellington Regional Council will work with Territorial Authorities to undertake programme(s) to support the health of waterbodies, including rivers and streams, estuaries and harbours, impacted by urban activities, including to:

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S33.022	6 Other methods	Method M45: Funding of wastewater and stormwater network upgrades	Support	Support funding opportunities for stormwater network upgrades.	Retain as notified
S33.023	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.	Support	Support the goals set out in the objective and consider the 2100 timeframe appropriate.	Retain as notified
S33.024	8 Whaitua Te Whanganui-a-Tara	Objective WH.O2: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers	Amend	Considers the 2040 timeframe will be difficult to achieve and does not take into account the environmental and financial constraints of Wellington City Council. Suggests 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.	Amend timeframe from 2040 to 2060.

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		and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora.			
S33.025	8 Whaitua Te Whanganui-a-Tara	Objective WH.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved to achieve the coastal water objectives set out in Table 8.1.	Amend	Considers the 2040 timeframe will be difficult to achieve and does not take into account the environmental and financial constraints of Wellington City Council. Suggests 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.	Amend timeframe from 2040 to 2060.

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S33.026	8 Whaitua Te Whanganui-a-Tara	Table 8.1 Coastal water objectives.	Amend	Considers the 2040 timeframe will be difficult to achieve and does not take into account the environmental and financial constraints of Wellington City Council. Suggests 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.	Amend timeframe from 2040 to 2060.
S33.027	8 Whaitua Te Whanganui-a-Tara	Objective WH.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status.	Support	Support the goal that nationally threatened freshwater species are increased.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S33.028	8 Whaitua Te Whanganui-a-Tara	Objective WH.O5: By 2040 the health and wellbeing of the Parangarahu Lakes and associated natural wetlands are on a trajectory of improvement towards wai ora.	Amend	Considers the 2040 timeframe will be difficult to achieve and does not take into account the environmental and financial constraints of Wellington City Council. Suggests 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.	Amend timeframe from 2040 to 2060.
S33.029	8 Whaitua Te Whanganui-a-Tara	Table 8.2 Target attribute states for lakes.	Amend	Considers the 2040 timeframe will be difficult to achieve and does not take into account the environmental and financial constraints of Wellington City Council. Suggests 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.	Amend timeframe from 2040 to 2060.
S33.030	8 Whaitua Te Whanganui-a-Tara	Objective WH.O8: Primary contact sites within Te Awa Kairangi/Hutt River, Pākuratahi	Support	Considers the 2040 timeframe will be difficult to achieve and does not take into account the environmental and financial constraints of Wellington City Council. Suggests 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.	Amend timeframe from 2040 to 2060.

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		River, Akatarawa River and Wainuiomata River are suitable for primary contact.			
S33.031	8 Whaitua Te Whanganui-a-Tara	Table 8.3 Primary contact site objectives in rivers.	Neutral	Considers the 2040 timeframe will be difficult to achieve and does not take into account the environmental and financial constraints of Wellington City Council. Suggests 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.	Amend timeframe from 2040 to 2060.
S33.032	8 Whaitua Te Whanganui-a-Tara	Objective WH.O9: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Support	Support the goal of maintaining and improving where appropriate.	Retain as notified.
S33.033	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Amend	Considers the 2040 timeframe will be difficult to achieve and does not take into account the environmental and financial constraints of Wellington City Council. Suggests the 2060 timeframe is consistent with WCC's spatial planning framework, and more consistent with the long-term	Amend timeframe from 2040 to 2060.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				plan and strategic financing of upgrades and expansions to the three waters network.	
S33.034	8 Whaitua Te Whanganui-a-Tara	Policy WH.P1: Improvement of aquatic ecosystem health.	Support	Consider the policy is reasonable to achieve the improvements to ecosystem health progressively.	Retain as notified.
S33.035	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	Concerns regarding the prohibitive provisions framework and if it the most appropriate to achieve the objectives and policies of the NPS-FM 2020. 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 that a Discretionary Activity status is more appropriate. Notes that as per case law prohibited activity class should not be used to defer an evaluation of a particular activity until such time as a plan change is lodged to allow undertaking the activity in question. Considers the District Plan is the most appropriate tool to manage urban development as set out in s3.5(4) of the NPS-FM 2020. Recommends that for development connected to the local authority stormwater networks, GWRC sets out the reduction requirements in the s15 global stormwater 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.	Amend as follows: Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non- regulatory methods, including Freshwater Action Plans, by: (a) ~~prohibiting unplanned greenfield development for other~~ greenfield developments minimising the contaminants and requiring contaminants ~~and requiring financial contributions as to offset adverse effects from residual stormwater contaminants,~~ and (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and ~~(c) imposing hydrological controls on urban development and stormwater discharges to rivers~~ (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, through stormwater management strategies and...
S33.036	8 Whaitua Te Whanganui-a-Tara	Policy WH.P3: Freshwater Action Plans role in the	Amend	Support in part. Consider it appropriate for Freshwater Action Plans to be developed cooperatively with Mana Whenua and territorial authorities to give effect to 3.5(3) of the NPS-FM 2020.	Amend as follows: Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways The Wellington Regional Council shall, in partnership with mana whenua and local territorial authorities, to prepare and deliver Freshwater

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		health and wellbeing of waterways.			Action Plans in accordance with Schedule 27 (Freshwater Action Plan)
S33.037	8 Whaitua Te Whanganui-a-Tara	Policy WH.P4: Achievement of the visual clarity target attribute states.	Amend	Considers the 2040 timeframe will be difficult to achieve and does not take into account the environmental and financial constraints of Wellington City Council. Suggests 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.	Amend timeframe from 2040 to 2060.
S33.038	8 Whaitua Te Whanganui-a-Tara	Table 8.5: Sediment load reductions required to achieve the visual clarity target attribute states.	Amend	Considers the 2040 timeframe will be difficult to achieve and does not take into account the environmental and financial constraints of Wellington City Council. Suggests 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.	Amend timeframe from 2040 to 2060.
S33.039	8 Whaitua Te Whanganui-a-Tara	Policy WH.P5: Localised adverse effects of point source discharge.	Amend	Oppose in part. Considers the use of 'avoid or minimised' to be conflicting and unworkable. More appropriate for the effects to be minimised as all effects cannot be avoided.	Amend as follow: The localised adverse effects of point source discharges to freshwater and coastal water beyond the zone of reasonable mixing are ~~avoided or~~ minimised, including by ~~avoiding~~ reducing:
S33.040	8 Whaitua Te Whanganui-a-Tara	Policy WH.P6: Cumulative adverse effects of	Amend	Oppose in part. Considers the use of 'avoid' to be unworkable and difficult to enforce, particularly for cumulative adverse effects.	Amend as follows: The cumulative adverse effects of point source discharges, excluding stormwater network and wastewater discharges, to water are ~~avoided~~ minimised and:

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		point source discharges .			
S33.041	8 Whaitua Te Whanganui-a-Tara	Policy WH.P8: Avoiding discharges of specific products and waste.	Support	Support the management of discharges to groundwater.	Retain as notified.
S33.042	8 Whaitua Te Whanganui-a-Tara	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Amend	Supports in part the management of copper and zinc contamination however notes this is currently managed by District Plans.	Amend policy to clarify GWRC role is managing copper and zinc contamination.
S33.043	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges .	Amend	Considers proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes. Identifies that development discharges are already managed via a global stormwater discharge consent, and that the WCC PDP proposes to manage on-site stormwater for s9 land uses which includes both water quality and water quantity management. Considers that the regional plan rule framework duplicates consenting requirements and recommends the NRP stays silent on this and GWRC focus on higher-level management of discharge consents, including stormwater not connected to a local authority stormwater network.	Amend as follows: Policy WH.P10: Managing adverse effects of stormwater discharges All stormwater discharges and associated land use activities that is not managed by a stormwater management strategy shall be managed by...

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S33.044	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Support	Support the management of high risk industrial or trade premises.	Retain as notified
S33.045	8 Whaitua Te Whanganui-a-Tara	Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy.	Support	Support the management of stormwater discharges from local authority and state highway network to ensure an integrated management approach to stormwater discharges from urban development.	Retain as notified.
S33.046	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Oppose	Considers proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes. Identifies that development discharges are already managed via a global stormwater discharge consent, and that the WCC PDP proposes to manage on-site stormwater for s9 land uses which includes both water quality and water quantity management. Considers that the regional plan rule framework duplicates consenting requirements and recommends the NRP stays silent on this and GWRC focus on higher-level management of discharge consents, including	Delete policy as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				stormwater not connected to a local authority stormwater network.	
S33.047	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Oppose	Opposes the double-up in contributions being made for development and considers this confuses the process for Territorial Authorities contributions which would go to the same water services entity to go towards catchment scale stormwater infrastructure management Considers there is a high risk of duplication, which does not promote integrated management.	Delete policy as notified.
S33.048	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Amend	Concerns regarding the prohibitive provisions framework and if it the most appropriate to achieve the objectives and policies of the NPS-FM 2020. Concerned 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. 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 that a Discretionary Activity status is more appropriate. Notes that as per case law prohibited activity class should not be used to defer an evaluation of a particular activity until such time as a plan change is lodged to allow undertaking the activity in question.	Amend policy to allow for Discretionary activity status OR delete policy.
S33.049	8 Whaitua Te Whanganui-a-Tara	Policy WH.P17: General wastewater policy to achieve target attribute states and	Amend	Support the management of wastewater to maintain or improve the baseline water quality state for Escherichia coli provided the targeted attribute timeframe is amended as proposed.	Retain as notified provided the targeted attribute timeframe is amended as proposed.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		coastal objectives.			
S33.050	8 Whaitua Te Whanganui-a-Tara	Policy WH.P18: Progressing works to meet Escherichia coli target attribute states.	Amend	Support the management of wastewater to maintain or improve the baseline water quality state for Escherichia coli.	Retain as notified provided the targeted attribute timeframe is amended as proposed.
S33.051	8 Whaitua Te Whanganui-a-Tara	Policy WH.P19: Managing wastewater network catchment discharges.	Amend	Considers the requirement for wet weather overflow events to meet or exceed containment standard of no more than 2 per year to be unachievable. Considers it more appropriate to determine a reasonable number of overflow events to occur on a catchment basis through Wastewater Network Catchment Improvement Strategy.	Amend WH.P19 as follow: ...(a) progressively reducing the frequency and/or volume of wet weather overflow events to meet or exceed the containment standard ~~of no more than 2 per year through the implementation of the methodologies set out~~ calculated at a catchment or sub-catchment scale as set out in a Wastewater Network Catchment Improvement Strategy prepared in accordance with Schedule 32...
S33.052	8 Whaitua Te Whanganui-a-Tara	Policy WH.P20: Managing existing wastewater treatment plant discharges.	Support	Support the management of existing wastewater treatment plant discharges.	Retain as notified
S33.053	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Support	Supports as the policy is consistent with Wellington City Council's Proposed District Plan (PDP).	Retain as notified
S33.054	8 Whaitua Te	Policy WH.P30: Discharge	Support	Supports as the policy is consistent with Wellington City Council's Proposed District Plan (PDP).	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	standard for earthworks.			
S33.055	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Support	Support, consistent with existing best practise.	Retain as notified
S33.056	8 Whaitua Te Whanganui-a-Tara	Rule WH.R1: Point source discharges of specific contaminants - prohibited activity.	Oppose	Concerns about the enforceability of this rule, particularly the prohibited activity status. Considers the s32 report does not demonstrate that using the prohibited activity status is the most appropriate option to achieve the objective of the plan.	Delete rule
S33.057	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Amend	Support in part. For the same reasons as set out in WH.R5 and to support integrated management and to remove the proposed overlapping consenting requirements from territorial authorities this rule should apply to stormwater that is discharged to local authority stormwater network.	Rule WH.R2: Stormwater to land - permitted activity The discharge of stormwater onto or into land, including where contaminants may enter groundwater: (a) that is not from a high risk industrial or trade premise, or (b) ~~that does not discharge from, or to, a local authority stormwater network~~ that written permission has been obtained from the owner of the local authority stormwater network, is a permitted activity provided the following conditions are met...
S33.058	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual property to surface	Amend	Support in part. For the same reasons as set out in WH.R5 and to support integrated management and to remove the proposed overlapping consenting requirements from territorial authorities this rule should apply to stormwater that is discharged to local authority stormwater network.	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity The discharge of stormwater from an existing individual property into water, or onto or into land where it may enter a surface water body or coastal water, (a) that is not from a high risk industrial or trade premise, or (b) that is not from a port, airport or state highway, or (c) ~~that does not discharge from, or to, a local authority~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		water or coastal water - permitted activity.			~~stormwater network~~ that written permission has been obtained from the owner of the local authority stormwater network, is a permitted activity, provided the following conditions are met:
S33.059	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Support	Generally supportive of GW being responsible for the discharge from high-risk industrial site.	Retain as notified
S33.060	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Oppose	Considers proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes. Identifies that development discharges are already managed via a global stormwater discharge consent, and that the WCC PDP proposes to manage on-site stormwater for s9 land uses which includes both water quality and water quantity management. Considers that the regional plan rule framework duplicates consenting requirements and recommends the NRP stays silent on this and GWRC focus on higher-level management of discharge consents, including stormwater not connected to a local authority stormwater network.	Delete rule in its entirety OR amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.
S33.061	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces -	Oppose	Considers proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes. Identifies that development discharges are already managed via a global stormwater discharge consent, and that the WCC PDP proposes to manage on-site stormwater for s9	Delete rule in its entirety OR amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		controlled activity.		land uses which includes both water quality and water quantity management. Considers that the regional plan rule framework duplicates consenting requirements and recommends the NRP stays silent on this and GWRC focus on higher-level management of discharge consents, including stormwater not connected to a local authority stormwater network.	
S33.062	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Oppose	Considers proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes. Identifies that development discharges are already managed via a global stormwater discharge consent, and that the WCC PDP proposes to manage on-site stormwater for s9 land uses which includes both water quality and water quantity management. Considers that the regional plan rule framework duplicates consenting requirements and recommends the NRP stays silent on this and GWRC focus on higher-level management of discharge consents, including stormwater not connected to a local authority stormwater network.	Delete rule in its entirety OR amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.
S33.063	8 Whaitua Te Whanganui-a-Tara	Rule WH.R9: Stormwater from a local authority or state highway network-restricted discretionary activity.	Support	Support the management of Local Authority or State Highway network through a restricted discretionary activity status.	Retain as notified
S33.064	8 Whaitua Te	Rule WH.R10: Stormwate	Amend	Opposes the double-up in contributions being made for development and considers this confuses the process for Territorial Authorities contributions	Delete requirement for financial contributions.

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	Whanganui-a-Tara	r from new state highways- discretionary activity.		which would go to the same water services entity to go towards catchment scale stormwater infrastructure management Considers there is a high risk of duplication, which does not promote integrated management.	
S33.065	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Not Stated	Considers proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes. Identifies that development discharges are already managed via a global stormwater discharge consent, and that the WCC PDP proposes to manage on-site stormwater for s9 land uses which includes both water quality and water quantity management. Considers that the regional plan rule framework duplicates consenting requirements and recommends the NRP stays silent on this and GWRC focus on higher-level management of discharge consents, including stormwater not connected to a local authority stormwater network.	Delete rule in its entirety OR amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.
S33.066	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Support	Support 'All other stormwater discharge' rule.	Retain as notified
S33.067	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development -	Amend	Concerns regarding the prohibitive provisions framework and if it the most appropriate to achieve the objectives and policies of the NPS-FM 2020. Concerned 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. Considers the prohibited activity status is not demonstrated through the s32	Amend rule to Discretionary activity status OR delete rule.

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		prohibited activity.		report as the most appropriate option to achieve the objectives of the plan, and that a Discretionary Activity status is more appropriate. Notes that as per case law prohibited activity class should not be used to defer an evaluation of a particular activity until such time as a plan change is lodged to allow undertaking the activity in question.	
S33.068	8 Whaitua Te Whanganui-a-Tara	Rule WH.R14: Wastewater network catchment discharges - restricted discretionary activity.	Amend	Support in part. Considers the rule to be difficult to understand, recommends amending the rule for clarity and succinctness.	Amend to clarify rule and give effect to the proposed amendment to the definition of 'existing wastewater discharge'
S33.069	8 Whaitua Te Whanganui-a-Tara	Rule WH.R15: Existing wastewater discharges from a treatment plant - discretionary activity.	Amend	Support in part. Considers the rule to be difficult to understand. Recommends amending the rule for clarity and succinctness.	Amend to clarify rule and give effect to the proposed amendment to the definition of 'existing wastewater discharge'
S33.070	8 Whaitua Te Whanganui-a-Tara	Rule WH.R16: All other discharges of wastewater - non-complying activity.	Amend	Considers non-complying status to be onerous and does not reflect that new treatment plants are often required to prevent both wet and dry weather overflow events. Considers the activity status increases infrastructure costs and can impede the staged upgrades of wastewater infrastructure.	Amend activity status from non-complying to Discretionary.
S33.071	8 Whaitua Te	Rule WH.R23:	Amend	Supports in-part but considers subclause (g) cannot be meet as you cannot guarantee that no sediment	Rule WH.R23: Earthworks - permitted activity Earthworks is a permitted activity, provided the following

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	Whanganui-a-Tara	Earthworks - permitted activity.		will leave the site or enter a waterbody, and that sediment is already managed by subclause (h). Also notes that minor earthworks could be captured by this rule as there is no scale associated with the control. Considers use of 'And' between (b) and (c) should be an 'Or'. The implication of the 'And' would require all activities that is not for erosion risk treatment plan for the farm, or to action in the farm environment plan for the farm would require a resource consent which is unreasonable.	conditions are met: ... (b) the earthworks are to implement an action in the farm environment plan for the farm, ~~and~~ or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and ... (g) ~~there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and~~ (h) erosion and sediment control measures shall be used for earthworks over 250m2 to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.
S33.072	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Support	Consistent with Wellington City Council's PDP.	Retain as notified provided that the proposed amendments to WH.R23 is accepted.
S33.073	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Support	Consistent with Wellington City Council's PDP.	Retain as notified.
S33.074	9 Te Awarua-o-Porirua Whaitua	Objective P.O1: The health of Te Awarua-o-Porirua's groundwater, rivers,	Support	Support the goals set out in the objective and consider the 2100 timeframe appropriate.	Retain as notified

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		lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100.			
S33.075	9 Te Awarua-o-Porirua Whaitua	Objective P.O2: Te Awarua-o-Porirua's groundwater, rivers, lakes and natural wetlands, and their margins are on a trajectory of measurable improvement towards wai ora.	Amend	Considers the 2040 timeframe will be difficult to achieve and does not take into account the environmental and financial constraints of Wellington City Council. Suggests 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.	Amend timeframe from 2040 to 2060.
S33.076	9 Te Awarua-	Objective P.O3: The health and	Amend	Considers the 2040 timeframe will be difficult to achieve and does not take into account the environmental and financial constraints of	Amend timeframe from 2040 to 2060.

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	o-Porirua Whaitua	wellbeing of coastal water quality, ecosystems and habitats in Pāuatahanui Inlet, Onepoto Arm and the open coastal areas of Te Awarua-o-Porirua is maintained or improved to achieve the coastal water objectives set out in Table 9.1.		Wellington City Council. Suggests 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.	
S33.077	9 Te Awarua-o-Porirua Whaitua	Table 9.1: Coastal water objectives.	Amend	Considers the 2040 timeframe will be difficult to achieve and does not take into account the environmental and financial constraints of Wellington City Council. Suggests 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.	Amend timeframe from 2040 to 2060.
S33.078	9 Te Awarua-o-Porirua Whaitua	Objective P.O4: The extent, condition,	Support	Support the goal that nationally threatened freshwater species are increased	Retain as notified

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		and connectivity of habitats of nationally threatened freshwater species are increased, and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status.			
S33.079	9 Te Awarua-o-Porirua Whaitua	Objective P.O5: Groundwater flows and levels, and water quality, are maintained.	Neutral	Not stated	Not stated
S33.080	9 Te Awarua-	Objective P.O6: Water	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	quality, habitats, water quantity and ecological processes of rivers are maintained or improved.			
S33.081	9 Te Awarua-o-Porirua Whaitua	Table 9.2: Target attribute states for rivers.	Amend	Considers the 2040 timeframe will be difficult to achieve and does not take into account the environmental and financial constraints of Wellington City Council. Suggests 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.	Amend timeframe from 2040 to 2060.
S33.082	9 Te Awarua-o-Porirua Whaitua	Policy P.P1: Improvement of aquatic ecosystem health.	Support	Support and consider the policy is reasonable to achieve the improvements to ecosystem health progressively.	Retain as notified
S33.083	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal	Amend	Concerns regarding the prohibitive provisions framework and if it the most appropriate to achieve the objectives and policies of the NPS-FM 2020. Concerned 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. 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 that a Discretionary	Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (a) ~~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~~ (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		water objectives.		Activity status is more appropriate. Notes that as per case law prohibited activity class should not be used to defer an evaluation of a particular activity until such time as a plan change is lodged to allow undertaking the activity in question.	(c) ~~imposing hydrological controls on urban development and stormwater discharges to rivers~~ (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, through stormwater management strategies and...
S33.084	9 Te Awarua-o-Porirua Whaitua	Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Amend	Support in-part. Consider it appropriate for Freshwater Action Plans to be developed cooperatively with Mana Whenua and territorial authorities to give effect to 3.5(3) of the NPS-FM 2020.	Amend as follow: Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways The Wellington Regional Council shall, in partnership with mana whenua and local territorial authorities, to prepare and deliver Freshwater Action Plans in accordance with Schedule 27 (Freshwater Action Plan)
S33.085	9 Te Awarua-o-Porirua Whaitua	Policy P.P4: Contaminant load reductions.	Support	Support the reduction of contaminants provided the timeframes are reasonable and practicable.	Retain as notified providing the proposed amendment for Table 9.3 is accepted.
S33.086	9 Te Awarua-o-Porirua Whaitua	Table 9.3: Harbour arm catchment contaminant load reductions.	Amend	Considers the 2040 timeframe will be difficult to achieve and does not take into account the environmental and financial constraints of Wellington City Council. Suggests 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.	Amend timeframe from 2040 to 2060.
S33.087	9 Te Awarua-o-Porirua Whaitua	Table 9.4: Part Freshwater Management Unit sediment load	Amend	Considers the 2040 timeframe will be difficult to achieve and does not take into account the environmental and financial constraints of Wellington City Council. Suggests 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.	Amend timeframe from 2040 to 2060.

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		reductions required to achieve the visual clarity target attribute state.			
S33.088	9 Te Awarua-o-Porirua Whaitua	Policy P.P5: Localised adverse effects of point source discharges.	Not Stated	Oppose in part. Considers the use of 'avoid or minimised' to be conflicting and unworkable. More appropriate for the effects to be minimised as all effects cannot be avoided.	Amend as follow: The localised adverse effects of point source discharges to freshwater and coastal water beyond the zone of reasonable mixing are ~~avoided or~~ minimised, including by ~~avoiding~~ reducing:
S33.089	9 Te Awarua-o-Porirua Whaitua	Policy P.P6: Point source discharges.	Not Stated	Oppose in part. Considers the use of 'avoid' to be unworkable and difficult to enforce, particularly for cumulative adverse effects.	The cumulative adverse effects of point source discharges, excluding stormwater network and wastewater discharges, to water are ~~avoided~~ minimised and:
S33.090	9 Te Awarua-o-Porirua Whaitua	Policy P.P7 Discharges to groundwater.	Neutral	Not stated	Not stated
S33.091	9 Te Awarua-o-Porirua Whaitua	Policy P.P8 Avoiding discharges of specific products and waste.	Not Stated	Support the management of discharges to groundwater.	Retain as notified

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S33.092	9 Te Awarua-o-Porirua Whaitua	Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Not Stated	Support in part the management of for copper and zinc contamination but notes this is currently being managed by District Plans.	Amend policy to clarify GWRC role is managing copper and zinc contamination.
S33.093	9 Te Awarua-o-Porirua Whaitua	Policy P.P10: Managing adverse effects of stormwater discharges.	Not Stated	Considers proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes. Specifically identifies that development discharges are already managed via a global stormwater discharge consent, and that the WCC PDP proposes to manage on-site stormwater for s9 land uses which includes both water quality and water quantity management. Considers that the regional plan rule framework duplicates consenting requirements and recommends the NRP stays silent on this and GWRC focus on higher-level management of discharge consents, including stormwater not connected to a local authority stormwater network.	Policy WH.P10: Managing adverse effects of stormwater discharges All stormwater discharges and associated land use activities that is not managed by a stormwater management strategy shall be managed by...
S33.094	9 Te Awarua-o-Porirua Whaitua	Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial	Not Stated	Support the management of high risk industrial or trade premises.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		or trade premises.			
S33.095	9 Te Awarua-o-Porirua Whaitua	Policy P.P12: Managing stormwater network discharges through a Stormwater Management Strategy.	Support	Support the management of stormwater discharges from local authority and state highway network to ensure an integrated management approach to stormwater discharges from urban development.	Retain as notified
S33.096	9 Te Awarua-o-Porirua Whaitua	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Oppose	Considers proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes. Specifically identifies that development discharges are already managed via a global stormwater discharge consent, and that the PDP for WCC proposes to manage on-site stormwater for s9 land uses which includes both water quality and water quantity management. Considers that the regional plan rule framework duplicates consenting requirements and recommends the NRP stays silent on this and GWRC focus on higher-level management of discharge consents, including stormwater not connected to a local authority stormwater network.	Delete policy as notified.
S33.097	9 Te Awarua-o-Porirua Whaitua	Policy P.P14: Stormwater contaminant offsetting for new greenfield	Oppose	Opposes the double-up in contributions being made for development, and considered this confuses the process for Territorial Authorities contributions. It is not clear if it is appropriate for two separate councils to charge for the same thing, and this does not promote integrated management.	Delete policy as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		development.			
S33.098	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Oppose	Concerns regarding the prohibitive provisions framework and if it the most appropriate to achieve the objectives and policies of the NPS-FM 2020. Concerned 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. 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 that a Discretionary Activity status is more appropriate. Notes that as per case law prohibited activity class should not be used to defer an evaluation of a particular activity until such time as a plan change is lodged to allow undertaking the activity in question.	Amend policy to allow for Discretionary activity status OR delete policy.
S33.099	9 Te Awarua-o-Porirua Whaitua	Policy P.P16: General wastewater policy to achieve target attribute states and coastal water objectives.	Amend	Support the management of wastewater to maintain or improve the baseline water quality state for Escherichia coli provided the targeted attribute timeframe is amended as proposed.	Retain as notified provided the targeted attribute timeframe is amended as proposed.
S33.100	9 Te Awarua-o-Porirua Whaitua	Policy P.P17: Progressing works to meet Escherichia coli target	Amend	Support the management of wastewater to maintain or improve the baseline water quality state for Escherichia coli.	Retain as notified provided the targeted attribute timeframe is amended as proposed.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		attribute states.			
S33.101	9 Te Awarua-o-Porirua Whaitua	Policy P.P18: Managing wastewater network catchment discharges.	Amend	Support the use of wastewater network catchment discharges.	Retain as notified
S33.102	9 Te Awarua-o-Porirua Whaitua	Policy P.P19: Managing existing wastewater treatment plant discharges.	Support	Considers the requirement for wet weather overflow events to meet or exceed containment standard of no more than 2 per year to be unachievable. Considers it more appropriate to determine a reasonable number of overflow events to occur on a catchment basis through Wastewater Network Catchment Improvement Strategy.	Amend WH.P19 as follow: ...(a) progressively reducing the frequency and/or volume of wet weather overflow events to meet or exceed the containment standard ~~of no more than 2 per year through the implementation of the methodologies set out~~ calculated at a catchment or sub-catchment scale as set out in a Wastewater Network Catchment Improvement Strategy prepared in accordance with Schedule 32 ...
S33.103	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Support	Supports as the policy is consistent with Wellington City Council's Proposed District Plan (PDP).	Retain as notified
S33.104	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Support	Supports as the policy is consistent with Wellington City Council's Proposed District Plan (PDP).	Retain as notified
S33.105	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of	Not Stated	Support, consistent with existing best practise.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		earthwork s.			
S33.106	9 Te Awarua-o-Porirua Whaitua	Rule P.R1: Point source discharges of specific contaminants - prohibited activity.	Not Stated	Concerns about the enforceability of this rule, particularly the prohibited activity status. Considers the s32 report does not demonstrate that using the prohibited activity status is the most appropriate option to achieve the objective of the plan.	Delete rule
S33.107	9 Te Awarua-o-Porirua Whaitua	Rule P.R2: Stormwater to land - permitted activity.	Amend	Supports in-part for the same reasons as set out in WH.R5, and to support integrated management and remove the proposed overlapping consenting requirements for stormwater discharged to a local authority stormwater network.	Rule WH.R2: Stormwater to land - permitted activity The discharge of stormwater onto or into land, including where contaminants may enter groundwater: (a) that is not from a high risk industrial or trade premise, or (b) ~~that does not discharge from, or to, a local authority stormwater network~~ that written permission has been obtained from the owner of the local authority stormwater network, is a permitted activity provided the following conditions are met...
S33.108	9 Te Awarua-o-Porirua Whaitua	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Amend	Supports in-part for the same reasons as set out in WH.R5, and to support integrated management and remove the proposed overlapping consenting requirements for stormwater discharged to a local authority stormwater network.	Rule WH.R3: Stormwater from an ~~existing~~ individual property to surface water or coastal water - permitted activity The discharge of stormwater from an existing individual property into water, or onto or into land where it may enter a surface water body or coastal water, (a) that is not from a high risk industrial or trade premise, or (b) that is not from a port, airport or state highway, or (c) ~~that does not discharge from, or to, a local authority stormwater network~~ that written permission has been obtained from the owner of the local authority stormwater network, is a permitted activity, provided the following conditions are met:
S33.109	9 Te Awarua-o-Porirua Whaitua	Rule P.R4: Stormwater from an existing high risk	Support	Generally supportive of GW being responsible for the discharge from high-risk industrial site.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		industrial or trade premise - permitted activity.			
S33.110	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Oppose	Considers proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes. Specifically identifies that development discharges are already managed via a global stormwater discharge consent, and that the WCC PDP proposes to manage on-site stormwater for s9 land uses which includes both water quality and water quantity management. Considers that the regional plan rule framework duplicates consenting requirements and recommends the NRP stays silent on this and GWRC focus on higher-level management of discharge consents, including stormwater not connected to a local authority stormwater network.	Delete rule in its entirety OR amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.
S33.111	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Not Stated	Considers proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes. Specifically identifies that development discharges are already managed via a global stormwater discharge consent, and that the WCC PDP proposes to manage on-site stormwater for s9 land uses which includes both water quality and water quantity management. Considers that the regional plan rule framework duplicates consenting requirements and recommends the NRP stays silent on this and GWRC focus on higher-level management of discharge consents, including stormwater not connected to a local authority stormwater network.	Delete rule in its entirety OR amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.
S33.112	9 Te Awarua-	Rule P.R7: Stormwater from new	Oppose	Considers proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource	Delete rule in its entirety OR amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	and redeveloped impervious surfaces of existing urbanised areas-controlled activity.		management outcomes. Specifically identifies that development discharges are already managed via a global stormwater discharge consent, and that the WCC PDP proposes to manage on-site stormwater for s9 land uses which includes both water quality and water quantity management. Considers that the regional plan rule framework duplicates consenting requirements and recommends the NRP stays silent on this and GWRC focus on higher-level management of discharge consents, including stormwater not connected to a local authority stormwater network.	
S33.113	9 Te Awarua-o-Porirua Whaitua	Rule P.R8: Stormwater from a local authority or state highway network-restricted discretionary activity.	Support	Support the management of local authority or State Highway Network through a restricted discretionary activity status.	Retain as notified
S33.114	9 Te Awarua-o-Porirua Whaitua	Rule P.R9: Stormwater from new state highways-discretionary activity.	Amend	Opposes the double-up in contributions being made for development, and considered this confuses the process for Territorial Authorities contributions. It is not clear if it is appropriate for two separate councils to charge for the same thing, and this does not promote integrated management.	Delete requirement for financial contributions.
S33.115	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious	Oppose	Considers proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes. Specifically identifies that development discharges are already managed via a global stormwater discharge consent, and that the WCC PDP proposes to manage on-site stormwater for s9 land uses which includes both water quality	Delete rule in its entirety OR amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		surfaces-discretionary activity.		and water quantity management. Considers that the regional plan rule framework duplicates consenting requirements and recommends the NRP stays silent on this and GWRC focus on higher-level management of discharge consents, including stormwater not connected to a local authority stormwater network.	
S33.116	9 Te Awarua-o-Porirua Whaitua	Rule P.R11: All other stormwater discharges - non-complying activity.	Not Stated	Support 'All other stormwater discharge' rule.	Retain as notified
S33.117	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Oppose	Concerns regarding the prohibitive provisions framework and if it the most appropriate to achieve the objectives and policies of the NPS-FM 2020. Concerned 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. 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 that a Discretionary Activity status is more appropriate. Notes that as per case law prohibited activity class should not be used to defer an evaluation of a particular activity until such time as a plan change is lodged to allow undertaking the activity in question.	Amend activity status to Discretionary or delete the rule.
S33.118	9 Te Awarua-o-Porirua Whaitua	Rule P.R13: Wastewater network catchment discharges	Amend	Support in-part. Considers the rule to be difficult to understand, recommend amending the rule for clarity and succinctness.	Amend to clarify rule and give effect to the proposed amendment to the definition of 'existing wastewater discharge'

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		to water - restricted discretionary activity.			
S33.119	9 Te Awarua-o-Porirua Whaitua	Rule P.R14: Existing wastewater discharges from a treatment plant to coastal and freshwater - discretionary activity.	Amend	Support in-part. Considers the rule to be difficult to understand, recommend amending the rule for clarity and succinctness.	Support in-part. Considers the rule to be difficult to understand, recommend amending the rule for clarity and succinctness.
S33.120	9 Te Awarua-o-Porirua Whaitua	Rule P.R15: All other discharges of wastewater - non-complying activity.	Amend	Considers non-complying status to be onerous and does not reflect that new treatment plants are often required to prevent both wet and dry weather overflow events. Considers the activity status increases infrastructure costs and can impede the staged upgrades of wastewater infrastructure.	Amend activity status from non-complying to Discretionary.
S33.121	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Amend	Supports in-part but considers subclause (g) cannot be met as you cannot guarantee that no sediment will leave the site or enter a waterbody, and that sediment is already managed by subclause (h). Also notes that minor earthworks could be captured by this rule as there is no scale associated with the control. Suggests use of 'And' between (b) and (c) should be an 'Or'. The implication of the 'And' would require all activities that is not for erosion risk treatment plan for the farm, or to action in the farm	Rule WH.R23: Earthworks - permitted activity Earthworks is a permitted activity, provided the following conditions are met: ... (b) the earthworks are to implement an action in the farm environment plan for the farm, ~~and~~ or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and ...~~(g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				environment plan for the farm would require a resource consent which is unreasonable.	~~marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and~~ (h) erosion and sediment control measures shall be used for earthworks over 250m2 to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.
S33.122	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Support	Consistent with Wellington City Council's PDP.	Retain as notified provided that the proposed amendments to P.R22 is accepted.
S33.123	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks - non-complying activity.	Support	Consistent with Wellington City Council's PDP.	Retain as notified
S33.124	12 Schedules	A Freshwater Action Plans	Support	Support Freshwater Action Plans provided they are developed with Territorial Authorities.	Retain as notified
S33.125	12 Schedules	A1 Purpose	Support	Support Freshwater Action Plans provided they are developed with Territorial Authorities.	Retain as notified
S33.126	12 Schedules	A2 Freshwater Action Plans required in Whaitua Te Whanganui-a-Tara.	Support	Support Freshwater Action Plans provided they are developed with Territorial Authorities.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S33.127	12 Schedules	A3 Freshwater Action Plans required in Te Awarua-o-Porirua Whaitua.	Support	Support Freshwater Action Plans provided they are developed with Territorial Authorities.	Retain as notified
S33.128	12 Schedules	B Freshwater Action Plan requirements.	Amend	Support in-part. Consider it appropriate for Freshwater Action Plans to be developed cooperatively with Mana Whenua and territorial authorities to give effect to 3.5(3) of the NPS-FM 2020.	Amend as follow: Be prepared in partnership with mana whenua and local territorial authorities
S33.129	12 Schedules	B1. Principles.	Support	Support the principles of Freshwater action plan provided it is developed in partnership with Territorial Authorities.	Retain as notified
S33.130	12 Schedules	B2. General Content.	Support	Support the general content of Freshwater action plan provided it is developed in partnership with Territorial Authorities.	Retain as notified
S33.131	12 Schedules	B3 Necessary actions.	Support	Support the necessary action of Freshwater action plan provided it is developed in partnership with Territorial Authorities.	Retain as notified
S33.132	12 Schedules	C. Freshwater Action Plans in Whaitua Te Whanganui-a-Tara	Support	Support Freshwater action plan in Whaitua Te Whanganui-a-Tara provided it is developed in partnership with Territorial Authorities.	Retain as notified
S33.133	12 Schedules	D Freshwater Action Plans in Te Awarua-o-	Support	Support Freshwater action plan in Te Awarua-o-Porirua Whaitua provided it is developed in partnership with Territorial Authorities.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Porirua Whaitua			
S33.134	12 Schedules	Schedule 28: Stormwater Contaminant Treatment.	Amend	Generally supportive provided that the associated rules are amended to exclude development connected to the local authority stormwater network.	Retain as notified provided that the associated rules are amended to exclude development connected to the local authority stormwater network.
S33.135	12 Schedules	Table 1: Target load Reductions for Copper and Zinc	Amend	Generally supportive provided that the associated rules are amended to exclude development connected to the local authority stormwater network.	Retain as notified provided that the associated rules are amended to exclude development connected to the local authority stormwater network.
S33.136	12 Schedules	Table 2: Additional Devices and Specified Load Reductions for Copper and Zinc	Amend	Generally supportive provided that the associated rules are amended to exclude development connected to the local authority stormwater network.	Retain as notified provided that the associated rules are amended to exclude development connected to the local authority stormwater network.
S33.137	12 Schedules	Schedule 29: Stormwater Impact Assessments.	Amend	Generally supportive provided that the associated rules are amended to exclude development connected to the local authority stormwater network.	Retain as notified provided that the associated rules are amended to exclude development connected to the local authority stormwater network.
S33.138	12 Schedules	Schedule 30: Financial Contributions.	Oppose	Opposes the double-up in contributions being made for development, and considered this confuses the process for Territorial Authorities contributions. It is not clear if it is appropriate for two separate councils to charge for the same thing, and this does not promote integrated management.	Delete schedule 31

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S33.139	12 Schedules	A Context	Oppose	Opposes the double-up in contributions being made for development, and considered this confuses the process for Territorial Authorities contributions. It is not clear if it is appropriate for two separate councils to charge for the same thing, and this does not promote integrated management.	Delete context
S33.140	12 Schedules	B Purpose	Oppose	Opposes the double-up in contributions being made for development, and considered this confuses the process for Territorial Authorities contributions. It is not clear if it is appropriate for two separate councils to charge for the same thing, and this does not promote integrated management.	Delete purpose
S33.141	12 Schedules	C Definition of an Equivalent Household Unit	Oppose	Opposes the double-up in contributions being made for development, and considered this confuses the process for Territorial Authorities contributions. It is not clear if it is appropriate for two separate councils to charge for the same thing, and this does not promote integrated management.	Delete definition
S33.142	12 Schedules	D Calculation of level of contribution	Oppose	Opposes the double-up in contributions being made for development, and considered this confuses the process for Territorial Authorities contributions. It is not clear if it is appropriate for two separate councils to charge for the same thing, and this does not promote integrated management.	Delete calculation
S33.143	12 Schedules	Table D1. Financial contribution calculations for residential greenfield development	Oppose	Opposes the double-up in contributions being made for development, and considered this confuses the process for Territorial Authorities contributions. It is not clear if it is appropriate for two separate councils to charge for the same thing, and this does not promote integrated management.	Delete table
S33.144	12 Schedules	Tale D2. Financial contribution	Oppose	Opposes the double-up in contributions being made for development, and considered this confuses the process for Territorial Authorities contributions. It is not clear if it is appropriate for two separate councils	Delete table

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		calculations for non-residential greenfield development and new roads/state highways		to charge for the same thing, and this does not promote integrated management.	
S33.145	12 Schedules	E Use	Oppose	Opposes the double-up in contributions being made for development, and considered this confuses the process for Territorial Authorities contributions. It is not clear if it is appropriate for two separate councils to charge for the same thing, and this does not promote integrated management.	Delete use
S33.146	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Support	Support the development and use of stormwater management strategies to achieve better water quality outcomes in a manner that is appropriate for the catchment and existing environmental pressures.	Retain as notified
S33.147	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Support	Support the development and use of Wastewater Network Catchment Improvement Strategy to achieve better water quality outcomes in a manner that is appropriate for the catchment and existing environmental pressures.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S33.148	13 Maps	Map 86: Unplanned greenfield areas - Porirua City Council.	Neutral	Concerns regarding the provision framework associated with the mapping of unplanned greenfields and whether it is the most appropriate way to achieve the objectives and policies of the NPS-FM 2020. Encourages GWRC to reconsider the appropriateness and legality of the proposed prohibited provisions.	Amend boundaries to include all open space zones within the urban boundary.
S33.149	13 Maps	Map 87: Unplanned greenfield areas - Wellington City Council.	Oppose	Concerns regarding the provision framework associated with the mapping of unplanned greenfields and whether it is the most appropriate way to achieve the objectives and policies of the NPS-FM 2020. Encourages GWRC to reconsider the appropriateness and legality of the proposed prohibited provisions.	Amend boundaries to include all open space zones within the urban boundary.
S33.150	13 Maps	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Oppose	Concerns regarding the provision framework associated with the mapping of unplanned greenfields and whether it is the most appropriate way to achieve the objectives and policies of the NPS-FM 2020. Encourages GWRC to reconsider the appropriateness and legality of the proposed prohibited provisions.	Amend boundaries to include all open space zones within the urban boundary.
S33.151	13 Maps	Map 89: Unplanned greenfield areas - Hutt City Council.	Oppose	Concerns regarding the provision framework associated with the mapping of unplanned greenfields and whether it is the most appropriate way to achieve the objectives and policies of the NPS-FM 2020. Encourages GWRC to reconsider the appropriateness and legality of the proposed prohibited provisions.	Amend boundaries to include all open space zones within the urban boundary.

S188 Wellington Fish and Game Regional Council

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S188.001	General comments	General comments - overall	Support	Seeks environmental outcomes set for the ecosystem health value	Seeks environmental outcomes set for the ecosystem health value
S188.002	General comments	General comments - target attribute states	Support	Seeks Target Attribute States be set to allow for maintenance and/or restoration of this level of ecosystem health, which may involve setting limits and bottom lines well above the national bottom lines.	Not stated
S188.003	General comments	General comments - water bodies	Amend	Considers all waterbodies should have Target Attribute States including estuaries, wetlands and groundwater. Considers wetlands have been excluded in the NRP PC1 from having Target Attribute States set.	Seeks all waterbodies (including wetlands) have Target Attribute States.
S188.004	General comments	General comments - consultation	Not Stated	Considers it important to include stakeholders like Wellington Fish and Game Council who have statutory responsibilities in consultation and management planning	Not stated
S188.005	General comments	General comments - overall	Not Stated	Suggests regular assessments and evaluations of Schedule I important to trout spawning and trout fishery rivers.	Not stated
S188.006	General comments	General comments - fresh water	Not Stated	Seeks regular, meaningful updates and reports to statutory managers and collaborators on outcomes of management and action plans. Considers them important to maintain collaboration and achieve environmental targets.	Seeks regular, meaningful updates and reports to statutory managers and collaborators on outcomes of management and action plan
S188.007	General comments	General comments - water bodies	Support	Considers it vital to address/ minimise the cumulative impacts of water takes and core allocation on waterbodies and aquatic ecosystem health.	Seeks reduced takes where rivers are suffering loss of natural form and character, and ecosystem degradation due to insufficient water flow.
S188.008	General comments	General comments - stormwate	Support	Considers it vital to manage stormwater, wastewater network catchment, and wastewater treatment plant discharges. Considers management and action plans should be SMART: Specific, Measurable,	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		r management		Ambitious but reasonable, Relevant, and Time-bound.	
S188.009	General comments	General comments - rural	Not Stated	Considers aquatic ecosystem health and wellbeing depends on managing diffuse discharges of nutrients and E. coli from farming activities. If current land use inputs of nutrients are not known, more conservative limits will need to be set to ensure the target reductions are achieved. Outcomes for Dissolved Inorganic Nitrogen concentrations should be set around 0.3 - 0.6 mg/L, and median Dissolved Reactive Phosphorus concentrations should be set at around 0.01 - 0.02 mg/L (Canning et al 2021), supported by a monitoring programme.	Seeks Dissolved Inorganic Nitrogen concentrations be set at 0.3 - 0.6 mg/L, and median Dissolved Reactive Phosphorus concentrations be set at 0.01 - 0.02 mg/L (Canning et al 2021). Seeks a comprehensive, regular, and frequent monitoring programme needed to assess concentrations of nutrients throughout catchment.
S188.010	General comments	General comments - water bodies	Not Stated	Notes research indicates that ~2% of New Zealand waterways are naturally soft-bottomed, but due to sediment inputs into waterways, currently ~ 20% of New Zealand rivers and streams now have soft sediment beds, rather than natural hard-bottomed, stony beds they historically displayed (Clapcott et al, 2011). Considers restoring silted streams should be a priority and restoration/monitoring should show this restoration over time.	Not stated
S188.011	General comments	General comments - target attribute states	Not Stated	Long-term target attribute timeframes require interim target attribute state timeframes also. Short-term milestones are useful for maintaining momentum over the lifetime of a vision, and minimising the likelihood of delays.	Interim target attribute state timeframes set for intervals of not more than 10 years with baselines which need to be achieved by the interim target date set.
S188.012	General comments	General comments - stormwater management	Not Stated	Considers policies governing adverse effects of stormwater discharges (e.g., policies P.P10, and WH. P10) contain multiple clauses giving reasons to not put good management practices into effect. Considers in accordance with national legislation, financial and economic reasons are not given precedence over restoration of degraded freshwater ecosystems.	Requirement for demonstrating functional need, and the effects management hierarchy should be included to bring the Plan into alignment with current national directives.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S188.013	General comments	General comments - stormwater management	Not Stated	Considers when plan change addresses adverse environmental impacts of stormwater or wastewater discharges, it is also important to weight ecosystem health as dictated by the RMA 1991, NPS-FM 2020, and Te Mana o te Wai. Therefore, wherever adverse environmental effects are to be "avoided where practicable", then the NPS-FM 2020 Section 3.21 to 3.24 requires a demonstration of a functional need for that activity, and if there is a functional need, then the effects management hierarchy must be applied.	Not stated
S188.014	General comments	General comments - wastewater	Not Stated	Considers when plan change addresses adverse environmental impacts of stormwater or wastewater discharges, it is also important to weight ecosystem health as dictated by the RMA 1991, NPS-FM 2020, and Te Mana o te Wai. Therefore, wherever adverse environmental effects are to be "avoided where practicable", then the NPS-FM 2020 Section 3.21 to 3.24 requires a demonstration of a functional need for that activity, and if there is a functional need, then the effects management hierarchy must be applied.	Not stated
S188.015	General comments	General comments - fresh water	Not Stated	Considers if sports fish or game bird habitats and interactions are considered to potentially impact on nationally threatened freshwater species, Wellington Fish and Game Council as statutory managers are required to be involved in any management plans and actions.	Not stated
S188.016	General comments	General comments - consultation	Not Stated	Concerned with a lack of consultation and questions if the NPSFM process has been followed correctly, particularly Section 3. 2 (b), which requires every regional council to engage with communities and tangata whenua to identify long-term visions, environmental outcomes, and other elements of the NOF.	Not stated
S188.017	General comments	General comments -	Not Stated	Concern that lack of communication with Wellington Fish and Game Council during PC1 development has led to omission acknowledging the requirement	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		consultation		to protect habitat for trout and salmon insofar as this is consistent with protections of the habitats of indigenous freshwater species (Policies 10 and Policies 9 of the NPSFM). Also, Appendix 1B requires that where FMUs or parts thereof have fishing values, attributes associated with this fishing value (for both indigenous and introduced freshwater fish) need to be specifically targeted to allow the numbers of fish to be sufficient and suitable for human consumption. Concerned limited engagement with community and no engagement with submitter potentially circumvented important aspects of NPSFM and allows for Plan to continue to not fulfil national level legislative obligations for freshwater health in key areas.	
S188.018	3 Objectives	Objective O18: Rivers, lakes, natural wetlands and coastal water are suitable for contact recreation and Māori customary use.	Support	Not stated	Not stated
S188.019	3 Objectives	Objective O19: Biodiversity, aquatic ecosystem health and mahinga kai in fresh	Amend	Considers clause c) requires strengthening: restoration of a degraded system or ecosystem is necessary under the NPS-FM, rather than merely encouraged.	Amend Clause (c) as follows: c) ~~restoration of aquatic ecosystem health and mahinga kai is encouraged.~~ **Aquatic ecosystem health and mahinga kai values are maintained where in good health and restored where degraded.**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		water bodies and the coastal marine area are safeguarded.			
S188.020	4 Policies	Policy P30: Biodiversity, aquatic ecosystem health and mahinga kai.	Support	Not stated	Not stated
S188.021	4 Policies	Policy P45: Protecting trout habitat.	Support	Not stated	Not stated
S188.022	5.4 Beds of lakes and rivers	5.4.4 Uses of beds of lakes and rivers general conditions.	Support	Not stated	Not stated
S188.023	5.4 Beds of lakes and rivers	Rule R151A: Ongoing diversion of a river - permitted activity.	Oppose	Concerns permitted activity status for permanent diversions over 10 years risks resulting in inappropriate structures creating potential adverse effects to waterbody flow, form, and character, as well as potential fish passage issues, which are contrary to Te Mana o te Wai, NPS-FM, and RMA.	Retain river diversions as discretionary or restricted activities to allow for uptake of new river management systems, ideas, and materials as knowledge and technologies progress.
S188.024	6 Other methods	6.16 Freshwater Action Plan	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		programme			
S188.025	6 Other methods	Method M37: Freshwater Action Plan for the Parangarahu Lakes.	Support	Not stated	Not stated
S188.026	6 Other methods	Method M38: Freshwater Action Plan for the Rangituhi catchment.	Support	Not stated	Not stated
S188.027	6 Other methods	Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	If sports fish or game bird habitats and interactions are considered to potentially impact on nationally threatened freshwater species, Wellington Fish and Game Council as statutory managers need to be involved in management plans and actions.	Amend to provide for Wellington Fish and Game Council involvement in management plans and action where sports fish or game bird habitats and interactions are considered to potentially impact on nationally threatened freshwater species.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S188.028	6 Other methods	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	Notes importance to include stakeholders for collaboration who have statutory responsibilities to habitat and species management, for the depth of their knowledge and experience as environmental advocates.	Amend to provide for Wellington Fish and Game Council involvement in management plans and action where sports fish or game bird habitats and interactions are considered to potentially impact on nationally threatened freshwater species.
S188.029	6 Other methods	Method M43: Supporting the health of urban waterbodies.	Support	Considers need for adequate resourcing of compliance and monitoring staff to enable these targets to be met.	Not stated
S188.030	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Support	Not stated	Not stated
S188.031	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within	Amend	Notes Target Attribute States require interim target attribute states set for intervals of not more than 10 years with baselines which must be achieved by the interim target date.	Include interim target attribute states set for intervals of not more than 10 years.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.			
S188.032	8 Whaitua Te Whanganui-a-Tara	Objective WH.O2: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora.	Amend	Valued introduced species have legislative protections, and protections of their habitats which often lead to improvements for indigenous freshwater species. Suggests note in clause c) to cover requirements for these species.	Amend Clause c): (c) diversity, abundance, composition, structure, and condition of mahinga kai species and communities, **including valued introduced species,** has increased.
S188.033	8 Whaitua Te Whanganui-a-Tara	Objective WH.O3: The health and	Amend	Valued introduced species have legislative protections, and protections of their habitats which often lead to improvements for indigenous	Amend Clause c): (c) diversity, abundance, composition, structure, and condition of mahinga kai species and communities, **including valued introduced species,** has increased.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved to achieve the coastal water objectives set out in Table 8.1.		freshwater species. Suggests note in clause c) to cover requirements for these species.	
S188.034	8 Whaitua Te Whanganui-a-Tara	Objective WH.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased and the long-term population numbers	Amend	Considers if sports fish or game bird habitats and interactions are considered to potentially impact on nationally threatened freshwater species, Wellington Fish and Game Council as statutory managers are required to be involved in any management plans and actions.	If sports fish or game bird habitats and interactions are considered to potentially impact on nationally threatened freshwater species, Wellington Fish and Game Council to be involved in management plans and strategy creation as the statutory managers of these and as the organisation with the comprehensive knowledge to be involved in management plans and actions.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		of these species and the area over which they occur are increased, improving their threat classification status.			
S188.035	8 Whaitua Te Whanganui-a-Tara	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	Support	Not stated	Not stated
S188.036	8 Whaitua Te Whanganui-a-Tara	Objective WH.O7: The physical integrity of aquitards is protected so that confined aquifer pressures are maintained.	Amend	Supports but needs elaborating, removal of aquifer water via bore extraction can cause aquitards to collapse (Zhang et al, 2014). Questions how this will be prevented.	Seeks clarification on how aquitard collapses will be prevented.
S188.037	8 Whaitua Te	Objective WH.O8:	Not Stated	Concerns with lack of factors considered as causing waterbodies to be unstable for contact recreation.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	Primary contact sites within Te Awa Kairangi/Hutt River, Pākuratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact.		Questions consideration for other impacts to be managed to create primary contact sites within these rivers	
S188.038	8 Whaitua Te Whanganui-a-Tara	Objective WH.O9: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Support	Not stated	Not stated
S188.039	8 Whaitua Te Whanganui-a-Tara	Policy WH.P1: Improvement of aquatic	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		ecosystem health.			
S188.040	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Support	Not stated	Not stated
S188.041	8 Whaitua Te Whanganui-a-Tara	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Not Stated	Notes resourcing and training of staff required to create Freshwater Action Plan	Not stated
S188.042	8 Whaitua Te Whanganui-a-Tara	Policy WH.P4: Achievement of the visual clarity target attribute states.	Support	Not stated	Not stated
S188.043	8 Whaitua Te Whanganui-a-Tara	Policy WH.P5: Localised adverse	Not Stated	Questions if this includes through increasing algal / macrophyte growth which removes O2 at night, or substrate infill from inputs from point source	Seeks mention of 'increasing algal / macrophyte growth which removes O2 at night, or substrate infill from inputs from point source discharges' if considered applicable.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		effects of point source discharge.		discharges too? If so, considers this should be explicitly mentioned where appropriate in the NRP	
S188.044	8 Whaitua Te Whanganui-a-Tara	Policy WH.P6: Cumulative adverse effects of point source discharges.	Amend	Support with minor amendments	Amend clause (b) to correct error: (b) part Freshwater Management ~~Uinits~~ **Units**
S188.045	8 Whaitua Te Whanganui-a-Tara	Policy WH.P7: Discharges to groundwater.	Amend	Seeks outcome and goal of improvement be clearly stated.	Amend Policy as follows: .. and where the quality of the groundwater is degraded, existing discharges shall be managed to improve groundwater quality **to a state of health and wellbeing such that the groundwater as tested will no longer be contributing to degradation of downstream aquatic environments or public health.**
S188.046	8 Whaitua Te Whanganui-a-Tara	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Amend	Target Attribute State timeframe of 2040 requires interim target attribute states set for intervals of not more than 10 years with baselines needed to be achieved by interim target date deadline.	Include interim target attribute states set for intervals of not more than 10 years.
S188.047	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwate	Not Stated	Notes effects management hierarchy should be embedded in clause as a directive for future consent pathway as per NPS-FM 2020 3.21 (iv). Notes importance stormwater inputs are addressed, and costs are not passed on to the environment or those who interact with downstream environment.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		r discharges.		Costs and economic feasibility should not be used as a 'get out of doing the right thing' card for developers, councils etc.	
S188.048	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Support	Not stated	Not stated
S188.049	8 Whaitua Te Whanganui-a-Tara	Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy.	Support	Not stated	Not stated
S188.050	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S188.051	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Not Stated	Considers financial contributions be set at a level that reflects costs of improvements and upgrades to stormwater systems to allow for improvements in effects of stormwater on receiving waterbodies. Considers contributions will have to be flexible, as costs of repairs, maintenance, and upgrades change in response to global economics, supply and demand.	Not stated
S188.052	8 Whaitua Te Whanganui-a-Tara	Policy WH.P17: General wastewater policy to achieve target attribute states and coastal objectives.	Support	Not stated	Not stated
S188.053	8 Whaitua Te Whanganui-a-Tara	Policy WH.P18: Progressing works to meet Escherichia coli target attribute states.	Support	Considers timeline requires interim timeframe targets set and monitored to achieve 2040 deadline	Include interim target attribute states set for intervals of not more than 10 years.
S188.054	8 Whaitua Te Whanganui-a-Tara	Policy WH.P19: Managing wastewater network catchment	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discharges .			
S188.055	8 Whaitua Te Whanganui-a-Tara	Policy WH.P20: Managing existing wastewater treatment plant discharges .	Support	Not stated	Not stated
S188.056	8 Whaitua Te Whanganui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Support	Not stated	Not stated
S188.057	8 Whaitua Te Whanganui-a-Tara	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Not Stated	Seeks reduction in nitrogen discharge risk "to the extent reasonably practicable" (clause c) in waterbodies which have been degraded by nutrient inputs and unlikely to achieve any measure of improvement as required by national legislation such as RMA 1991, NPS-FM 2020, and Te Mana o te Wai.	Strengthen policy, with time-bound and measurable actions which will return degraded waterways in a stepwise fashion to a state of health and wellbeing.
S188.058	8 Whaitua Te	Policy WH.P23: Achieving	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	reductions in sediment discharges from farming activities on land with high risk of erosion.			
S188.059	8 Whaitua Te Whanganui-a-Tara	Policy WH.P24: Phasing of farm environment plans.	Not Stated	Notes need for resourcing consultants to certify effective FEPs.	Not stated
S188.060	8 Whaitua Te Whanganui-a-Tara	Policy WH.P25: Managing rural land use change.	Support	Not stated	Not stated
S188.061	8 Whaitua Te Whanganui-a-Tara	Policy WH.P26: Managing livestock access to small rivers.	Support	Not stated	Not stated
S188.062	8 Whaitua Te Whanganui-a-Tara	Policy WH.P27: Promoting stream shading.	Support	Not stated	Not stated
S188.063	8 Whaitua Te	Policy WH.P28: Achieving	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	reductions in sediment discharges from plantation forestry.			
S188.064	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Not Stated	Considers if Erosion and Sediment Control Guideline (2021) was sufficient, there would be no sediment in waterways from earthworks. Notes earthworks still currently noted to cause sediment inputs into waterways around region, so increased measures to control inputs are required.	Seeks increased measures to control sediment inputs into waterways.
S188.065	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Not Stated	Considers if the Erosion and Sediment Control Guideline (2021) was sufficient, there would be no sediment in waterways from earthworks. Notes earthworks still currently noted to cause sediment inputs into waterways around region, so increased measures to control inputs are required. Supports policy discussing visual monitoring. Considers clause (a) locks in ability to keep pumping sediment into already sediment laden rivers which will not allow for improvement in degraded waterways and does not align with Te Mana o te Wai, RMA (1991), the NPS-FM (2020). Considers action suggested in clause c), if visual clarity triggers be reached, reports results to GWRC, rather than practical methodologies such as halting work and allowing waterway time to clear. Reports, while valuable for preventing further incidents, do little to protect waterways from immediate harm from earthworks.	Not stated
S188.066	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		of earthworks.			
S188.067	9 Te Awarua-o-Porirua Whaitua	Objective P.O1: The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is waiora by 2100.	Amend	Supports with amendments, notes interim targets will be required which set out SMART goals	Seeks interim targets be set
S188.068	9 Te Awarua-o-Porirua Whaitua	Objective P.O2: Te Awarua-o-Porirua's groundwater, rivers, lakes and natural wetlands, and their margins are on a	Amend	Supports with amendments, notes interim targets will be required which set out SMART goals	Seeks interim targets be set

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		trajectory of measurable improvement towards wai ora.			
S188.069	9 Te Awarua-o-Porirua Whaitua	Objective P.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Pāuatahanui Inlet, Onepoto Arm and the open coastal areas of Te Awarua-o-Porirua is maintained or improved to achieve the coastal water objectives set out in Table 9.1.	Amend	Supports with amendments, notes interim targets will be required which set out SMART goals	Seeks interim targets be set

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S188.070	9 Te Awarua-o-Porirua Whaitua	Objective P.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased, and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status.	Amend	If sports fish or game bird habitats and interactions are considered to potentially impact on nationally threatened freshwater species, WFGC to be involved in management plans and strategy creation as the statutory managers of these and as the organisation with the comprehensive knowledge to be involved in management plans and actions.	Amend to provide for Wellington Fish and Game Council involvement in management plans and action where sports fish or game bird habitats and interactions are considered to potentially impact on nationally threatened freshwater species.
S188.071	9 Te Awarua-o-Porirua Whaitua	Objective P.O5: Groundwater flows and levels, and water quality, are maintained.	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S188.072	9 Te Awarua-o-Porirua Whaitua	Objective P.O6: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Support	Not stated	Not stated
S188.073	9 Te Awarua-o-Porirua Whaitua	Policy P.P1: Improvement of aquatic ecosystem health.	Support	Not stated	Not stated
S188.074	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Support	Not stated	Not stated
S188.075	9 Te Awarua-o-Porirua Whaitua	Policy P.P3: Freshwater Action	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Plans role in the health and wellbeing of waterways .			
S188.076	9 Te Awarua-o-Porirua Whaitua	Policy P.P4: Contaminant load reductions .	Support	Not stated	Not stated
S188.077	9 Te Awarua-o-Porirua Whaitua	Policy P.P5: Localised adverse effects of point source discharges .	Support	Not stated	Not stated
S188.078	9 Te Awarua-o-Porirua Whaitua	Policy P.P7 Discharges to groundwater.	Support	Not stated	Not stated
S188.079	9 Te Awarua-o-Porirua Whaitua	Policy P.P8 Avoiding discharges of specific products and waste.	Support	Not stated	Not stated
S188.080	9 Te Awarua-	Policy P.P9: General	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	stormwater policy to achieve the target attribute states and coastal water objectives.			
S188.081	9 Te Awarua-o-Porirua Whaitua	Policy P.P10: Managing adverse effects of stormwater discharges.	Not Stated	Notes importance stormwater inputs are addressed, and costs are not passed on to the environment or those who interact with downstream environment. Considers costs and economic feasibility should not be used as a 'get out of doing the right thing' card for developers, councils etc.	Seeks effects management hierarchy should be embedded in clause (c)
S188.082	9 Te Awarua-o-Porirua Whaitua	Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises.	Amend	Considers emphasis in clause b) on not practicable, gives appearance of leeway in allowing pollutants to enter waterways. Considers rephrasing may emphasise necessity for all means available to prevent contaminant release into environment.	Amend Clause (b) as follows: (b) [...] avoiding contaminants of hazardous substances being entrained in stormwater and discharges to a surface water body or coastal water, including via the stormwater network, **or if contaminant release can be demonstrated to have been unavoidable,** implementing good management practice to avoid or minimise adverse effects on the environment including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and:**applying the effects management hierarchy where activity demonstrates a functional need to operate.**
S188.083	9 Te Awarua-o-Porirua Whaitua	Policy P.P12: Managing stormwater network discharges through a	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Stormwater Management Strategy.			
S188.084	9 Te Awarua-o-Porirua Whaitua	Policy P.P16: General wastewater policy to achieve target attribute states and coastal water objectives.	Support	Not stated	Not stated
S188.085	9 Te Awarua-o-Porirua Whaitua	Policy P.P17: Progressing works to meet Escherichia coli target attribute states.	Support	Not stated	Not stated
S188.086	9 Te Awarua-o-Porirua Whaitua	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from	Not Stated	Seeks a reduction in diffuse discharges of nitrogen where nitrogen use and leaching makes this necessary, regardless of size of property.	Amend policy as follows: Diffuse nitrogen discharges from large rural properties and from smaller rural properties that are intensively farmed, are capped, minimising, and ~~on large properties~~ reduced where necessary by ensuring that: [...]

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		farming activities.			
S188.087	9 Te Awarua-o-Porirua Whaitua	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Support	Not stated	Not stated
S188.088	9 Te Awarua-o-Porirua Whaitua	Policy P.P23: Phasing of farm environment plans.	Support	Not stated	Not stated
S188.089	9 Te Awarua-o-Porirua Whaitua	Policy P.P25: Promoting stream shading.	Support	Not stated	Not stated
S188.090	9 Te Awarua-o-Porirua Whaitua	Policy P.P30: Minimum flows and minimum water levels in Te Awarua-o-Porirua Whaitua.	Not Stated	Seeks no decrease in number/extent of wetlands and increase in wetland numbers/extent where practicable.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S188.091	9 Te Awarua-o-Porirua Whaitua	Policy P.P31: Water takes at minimum flows and minimum water levels.	Not Stated	Considers need to phase out resource consents contributing to cumulative overallocation of a catchment or waterbody to allow return to health natural flow, form and characteristics of the water body affected and to give effect to Te Mana o te Wai and the NPSFM.	Phase out resource consents contributing to cumulative overallocation of a catchment or waterbody to allow a return to health natural flow, form and characteristics of the water body affected.
S188.092	9 Te Awarua-o-Porirua Whaitua	Policy P.P32: Allocation in the Te Awarua-o-Porirua Whaitua.	Support	Not stated	Not stated
S188.093	12 Schedules	B1. Principles.	Amend	Supports clauses 5-7 and in full and clauses 1-8 with amendments. Seeks inclusion of stakeholders with knowledge and experience as environmental advocates.	Amend clauses 1-8 of Schedule 27 (B1): 1. be prepared in partnership with mana whenua and **stakeholders,** and 8. recognise the value and necessity of integrated management planning and delivery, **including collaborating with stake holders and statutory managers in the planning process for their expertise and knowledge.**
S188.094	12 Schedules	B2. General Content.	Amend	Seeks inclusion of stakeholders for collaboration who have statutory responsibilities to habitat and species management, for the depth of their knowledge and experience as environmental advocates.	Amend clause 1 (a) of Schedule 27 (B2): a) Contain any other attribute of environmental outcome identified in partnership with mana whenua or through consultation with **stakeholders** and local communities, provided any additional goals do not detract or prevent the relevant TAS identified to be achieved.
S188.095	12 Schedules	B3 Necessary actions.	Amend	Endorses freshwater action plans.	Not stated
S188.096	12 Schedules	Schedule 31: Stormwate	Amend	Seeks inclusion of stakeholders for collaboration who have statutory responsibilities to habitat and species management, for the depth of their	Amend Clause (b) to include reference of stakeholders: (b) set out the methodology, including information

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		r Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.		knowledge and experience as environmental advocates. Considers management options (h) monitoring and management be undertaken in collaboration with submitter where detrimental effects are likely to impact trout habitat, trout spawning habitat, and habitat allowing for life cycle movement of trout and sports fish.	requirements and engagement with mana whenua, **stakeholders,** and the community.
S188.097	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Seeks inclusion of stakeholders for collaboration who have statutory responsibilities to habitat and species management, for the depth of their knowledge and experience as environmental advocates.	Amend Clause (h) to include reference of stakeholders: (h) set out the methodology, including information requirements and engagement with mana whenua, **stakeholders,** and the community.

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Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S101.001	General comments	General comments - water quality improvements	Oppose	Policy P30(b) Should the relief sought by the submitter with respect to Chapter 8 of the NRP not be accepted, the submitter opposes the proposed exclusion of these provisions as they relate to Whaitua Te Whanganui-a-Tara.	Retain application of these provisions to Whaitua Te Whanganui-a-Tara (by removing the symbol).
S101.002	General comments	General comments - water quality improvements	Amend	Notes new freshwater related objectives and policies within the Proposed NRP seek to give effect to the National Policy Statement for Freshwater Management 2020 ("NPSFM") but some of the provisions also refer to the coastal marine area / coastal environment. Concerned that this will result in the management of the coastal resources in a way that is inconsistent with the New Zealand	Delete any reference to the coastal marine area from those provisions which seek to directly give effect to the NPSFM.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Coastal Policy Statement ("NZCPS") and the remaining sections of the Operative NRP which are not subject to the Proposed NRPm, and will apply freshwater management concepts to the coastal marine area and the coastal environment which is not appropriate.	
S101.003	General comments	General comments - fresh water	Amend	Does not oppose amendments to schedule F2(C), F4 and F5, and understands that a consenting pathway remains available through the operative NRP provisions for regionally significant infrastructure to continue to operate in these areas. Provided this pathway remains available, supports the identification of the additional scheduled items (namely Horse mussels and Adamsiella beds within Evans Bay), subject to the identification of these particular features being accurately identified and mapped.	Not stated
S101.004	General comments	General comments - unplanned greenfield development	Oppose	Notes significant concerns with the approach to unplanned greenfield development areas and considers that a more sophisticated approach is required. Considers it is unclear whether the term "unplanned greenfield development" and associated terms would include activities undertaken in relation to regionally significant infrastructure, such as the Airport. Considers prohibiting development based on underlying land use zoning does not recognise or account for the ability for requiring authorities to utilise a designation. Considers the strong policy directive to prohibit unplanned greenfield development could be used as the rationale for declining resource consent or recommending the withdrawal of a notice of requirement for nationally and regionally significant infrastructure projects. Considers the proposed new "unplanned greenfield development" provisions will potentially curtail	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				proposed development projects despite the significant benefits that will accrue. Considers the approach to unplanned greenfield development warrants significant rework to ensure that regionally significant infrastructure providers can continue to meet the needs of the region's community	
S101.005	General comments	General comments - stormwater management	Oppose	Notes that the submitter has secured a site wide stormwater discharge permit which provides for all stormwater discharges from activities and areas within the Airport boundary, and has prepared a comprehensive stormwater management plan as part of the consent. The stormwater discharge permit was granted under Rule R54 of the Operative NRP, which the submitter considers is effective in that it encourages WIAL to actively manage its stormwater discharges in an integrated and comprehensive way. The submitter therefore supports the retention of the Operative approach in the Proposed NRP and considers that further amendments are required to various rules within the Proposed NRP to reflect the Operative NRP approach.	Not stated
S101.006	General comments	General comments - earthworks	Oppose	Considers regular maintenance and repair of the roads, runways, taxiways and aprons at the Airport to ensure their safety and functionality is maintained should be excluded from the proposed new earthworks provisions. Considers that in the absence of this change, the submitter will be subject to an inefficient and unnecessary consenting burden for activities that form part of its ongoing operational requirements. Opposes the winter shutdown provisions as it fails to provide a consenting pathway for large scale infrastructure projects that often span months to years in duration and will add significant cost and time to infrastructure projects undertaken by WIAL and likely other infrastructure providers, and will	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				constrain infrastructure providers ability to meet the ongoing needs of the community. Considers the approach fails to recognise that some earthworks activities must avoid certain breeding, spawning or nesting periods if significant indigenous fauna are located on site.	
S101.007	General comments	General comments - stormwater management	Oppose	Notes the operational and functional requirements of some regionally significant infrastructure necessitate large areas of impermeable surfaces which stormwater management systems are typically included into. Notes submitter has recently secured a site wide stormwater discharge permit and given the measures being implemented by the submitter and its contribution to reducing the overall effect it is having on (ultimately) coastal water quality, it does not seem reasonable or equitable to require financial contributions for any "residual effect". Considers the contribution in Schedule 30 is payable for an effect that does not necessarily arise as a result of the activity that resource consent is being sought for and this is inappropriate and unlawful. WIAL opposes the proposed introduction of financial contributions and considers they should be deleted in their entirety.	Delete financial contributions provisions in their entirety.
S101.008	General comments	General comments - current legislation	Amend	Considers GWRC should postpone any hearings on the Proposed NRP until such a time that decisions on the Proposed RPS are issued and any appeals resolved.	Postpone any hearings on the Proposed NRP until such a time that decisions on the Proposed RPS are issued and any appeals resolved.
S101.009	General comments	General comments - overall	Amend	Considers as notified, the Proposed NRP was unduly complex and difficult to follow. Considers the numbering of the schedules used in the Proposed NRP also gives rise to potential confusion. Submitter assumes that Schedules A to Z will be renumbered 1 to 26, or Schedules 27 to 34 will be alphanumerically numbered. Opposes the	Issue a tracked change version of the Proposed NRP, both electronic and hard copy, prior to any directions requiring the preparation of s42A reports and evidence to ensure that it is clear which provisions are changing, where and how they sit within the wider context of the Operative NRP. This should include, as anticipated by the New Zealand Planning Standards, appropriate links to cross reference rules or

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				schedules to the extent that it is not clear what comprises Schedules 1 to 26.	provisions, or other documents. Reformat to provide appropriate links and a contents page.
S101.010	General comments	General comments - overall	Oppose	Considers that in the absence of amendments to the Proposed NRP to address and give effect to the submission, the Proposal will not promote the sustainable management or efficient use and development of natural and physical resources, is not the most appropriate way to achieve the purpose of the RMA, particularly when having regard to the efficiency and effectiveness of the provisions relative to other means, and does not appropriately fulfil the requirements of section 32 of the RMA, particularly in terms of evaluation the costs of implementing the provisions under section 32(2)(a); Considers the Proposal does not represent sound resource management practice particularly with respect to planning for Wellington Airport, as regionally significant infrastructure.	That the submission points contained in this submission be accepted, or that the Proposed NRP be amended in a similar or such other way as may be appropriate to address the submission points; and Any alternative, consequential changes (including to objectives, policies, methods and anticipated environmental results or other provisions), amendments or decisions that may be required to give effect to the matters raised in the submission. Where any submission point seeks to amend a provision, should that relief not be granted, delete that provision and revert to the Operative NRP.
S101.011	2 Interpretation	Coastal water management units	Amend	To ensure consistent interpretation and application of the objectives, policies and rules. considers a new map be should be included which clearly delineates the boundaries of each Whaitua, including both coastal and landward areas.	Insert a new planning map that clearly identifies Whaitua Te Whanganui-a-Tara, including both the coastal and landward areas.
S101.012	2 Interpretation	Earthworks	Oppose	In order to facilitate the ongoing and timely maintenance and repair of WIAL assets, considers that the existing earthworks exclusion for activities relating to the repair or maintenance of existing roads and tracks, airfield runways, taxiways and parking aprons for aircraft should be included in the proposed new earthworks definition. Considers without the exclusion the submitter will be subject to an inefficient and unnecessary consenting burden for activities that form part of its ongoing operational requirements. Notes that WIAL actively manages all earthworks undertaken at the airport due to the potentially	Retain the operative definition of earthworks insofar as it relates to the Airport or exclude the repair or maintenance of existing roads and tracks, airfield runways, taxiways and parking aprons for aircraft at the Airport from the earthworks definition for Whaitua Te Whanganui-a-Tara.

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				significant effects that poorly managed earthworks can have on aircraft operations and safety.	
S101.013	2 Interpretation	High risk industrial or trade premise	Oppose	Considers the Airport should be excluded from this definition or the association provisions relating to high risk industrial or trade premises to avoid unnecessary duplication of the methods that relate to high risk industrial or trade premises where located at the Airport.	Amend the definition to exclude Airport activities. Or delete and revert to Operative NRP.
S101.014	2 Interpretation	Impervious surfaces	Oppose	Considers the Airport should therefore be excluded from this definition to avoid unnecessary duplication of the methods that relate to impervious surfaces where located at the Airport.	Amend the definition to exclude the Airport. Or delete and revert to Operative NRP.
S101.015	2 Interpretation	Redevelopment	Oppose	Considers it is not clear what is captured by the phrase of "existing urbanised property" and whether this is intended to apply to Wellington International Airport. Considers the Airport should therefore be excluded from this definition to avoid unnecessary duplication of the methods that relate to impervious surfaces where located at the Airport. Notes concerns with respect to the provisions relating to "greenfield development" (and associated terms). For the reasons expressed in submission points on Policy WH.P2 and WH.P14, seeks activities at Wellington International Airport be exempt from this definition.	Amend the definition to exclude the Airport. Or delete and revert to Operative NRP.
S101.016	2 Interpretation	Unplanned greenfield development	Oppose	Considers it is not clear what is captured by the term "greenfield development" and whether this is intended to apply to the Airport when proposing or carrying out activities as a network utility operator and regionally significant infrastructure provider. Notes concerns with respect to the provisions relating to "greenfield development" (and associated terms). For the reasons expressed in submission points on Policy WH.P2 and WH.P14, seeks activities at Wellington International Airport be exempt from this definition.	Amend the definition to exclude the Airport and/ or Network Utility Operators. Or delete and revert to Operative NRP.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S101.017	2 Interpretation	Whaitua	Amend	To ensure consistent interpretation and application of the objectives, policies and rules. considers a new map be should be included which clearly delineates the boundaries of each Whaitua, including both coastal and landward areas.	Insert a new planning map which clearly delineates all of the whaitua, including both coastal and landward areas of each one.
S101.018	3 Objectives	Objective O2	Oppose	Considers Objective O2 is reasonably broad and gives effect to the outcomes sought in Part 2 of the RMA. Considers it is appropriate for the objective to be retained as part of the Proposed NRP. Opposes the proposed exclusion of these provisions as they relate to Whaitua Te Whanganui-a-Tara.	Retain the application of operative Objective O2 to Whaitua Te Whanganui-a-Tara (by removing the symbol).
S101.019	3 Objectives	Objective O34	Amend	Should the relief sought by the submitter with respect to Chapter 8 of the NRP not be accepted, the submitter opposes the proposed exclusion of these provisions as they relate to Whaitua Te Whanganui-a-Tara.	Retain application of these provisions to Whaitua Te Whanganui-a-Tara (by removing the symbol).
S101.020	3 Objectives	Objective O36	Amend	Should the relief sought by the submitter with respect to Chapter 8 of the NRP not be accepted, the submitter opposes the proposed exclusion of these provisions as they relate to Whaitua Te Whanganui-a-Tara.	Retain application of these provisions to Whaitua Te Whanganui-a-Tara (by removing the symbol).
S101.021	3 Objectives	Objective O37	Amend	Should the relief sought by the submitter with respect to Chapter 8 of the NRP not be accepted, the submitter opposes the proposed exclusion of these provisions as they relate to Whaitua Te Whanganui-a-Tara.	Retain application of these provisions to Whaitua Te Whanganui-a-Tara (by removing the symbol).
S101.022	3 Objectives	Objective O38	Amend	Should the relief sought by the submitter with respect to Chapter 8 of the NRP not be accepted, the submitter opposes the proposed exclusion of these provisions as they relate to Whaitua Te Whanganui-a-Tara.	Retain application of these provisions to Whaitua Te Whanganui-a-Tara (by removing the symbol).
S101.023	3 Objectives	Objective O18: Rivers, lakes, natural wetlands and	Amend	Should the relief sought by the submitter with respect to Chapter 8 Objective WH.O3 of the NRP not be accepted, the submitter opposes the proposed note that excludes application of the objective and associated Tables 3.1 to 3.3 to Whaitua Te Whanganui-a-Tara.	Delete the proposed amendments to the Note for Objective O18.

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		coastal water are suitable for contact recreation and Māori customary use.			
S101.024	3 Objectives	Objective O19: Biodiversity, aquatic ecosystem health and mahinga kai in fresh water bodies and the coastal marine area are safeguarded.	Amend	Should the relief sought by the submitter with respect to Chapter 8 of the NRP not be accepted, the submitter opposes the proposed note that excludes application of the objective and associated Tables 3.7 to 3.8 to Whaitua Te Whanganui-a-Tara.	Delete the proposed amendments to the Note for Objective O19.
S101.025	3 Objectives	Objective O28: Ecosystems and habitats with significant indigenous biodiversity values are protected from the adverse	Amend	Should the relief sought by the submitter with respect to Chapter 8 of the NRP not be accepted, the submitter opposes the proposed note that excludes application of the objective and associated Tables 3.7 to 3.8 to Whaitua Te Whanganui-a-Tara.	Delete the proposed amendments to the Note for Objective O28.

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		effects of use and development, and where appropriate restored to a healthy functioning state including as defined by Tables 3.4, 3.5, 3.6, 3.7 and 3.8.			
S101.026	4 Policies	Policy P77: Improving water quality for contact recreation and Māori customary use.	Amend	Should the relief sought by the submitter with respect to Chapter 8 of the NRP not be accepted, the submitter opposes the proposed exclusion of these provisions as they relate to Whaitua Te Whanganui-a-Tara.	Retain application of these provisions to Whaitua Te Whanganui-a-Tara (by removing the symbol).
S101.027	4 Policies	Policy P82: Avoiding inappropriate discharges to water.	Support	Supports the proposed exclusion of this policy to Whaitua Te Whanganui-a-Tara.	Retain as notified.
S101.028	4 Policies	Policy P83: Minimising adverse	Amend	Should the relief sought by the submitter with respect to Chapter 8 of the NRP not be accepted, the submitter opposes the proposed exclusion of	Retain application of these provisions to Whaitua Te Whanganui-a-Tara (by removing the symbol).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		effects of stormwater discharges.		these provisions as they relate to Whaitua Te Whanganui-a-Tara.	
S101.029	4 Policies	Policy P84: Managing land use impacts on stormwater.	Amend	Should the relief sought by the submitter with respect to Chapter 8 of the NRP not be accepted, the submitter opposes the proposed exclusion of these provisions as they relate to Whaitua Te Whanganui-a-Tara.	Retain application of these provisions to Whaitua Te Whanganui-a-Tara (by removing the symbol).
S101.031	4 Policies	Policy P30: Biodiversity, aquatic ecosystem health and mahinga kai.	Amend	Should the relief sought by the submitter with respect to Chapter 8 of the NRP not be accepted, the submitter opposes the proposed note that excludes application of the objective and associated Tables 3.7 to 3.8 to Whaitua Te Whanganui-a-Tara.	Delete the proposed amendments.
S101.032	4 Policies	Policy P36: Restoring Wairarapa Moana	Amend	Should the relief sought by the submitter with respect to Chapter 8 of the NRP not be accepted, the submitter opposes the proposed exclusion of this policy to Wellington Harbour.	Delete the proposed amendments.
S101.033	4 Policies	Policy P78: Managing point source discharges for aquatic ecosystem health and mahinga kai.	Amend	Should the relief sought by the submitter with respect to Chapter 8 of the NRP not be accepted, the submitter opposes the proposed note that excludes application of the objective and associated Tables 3.4 to 3.8 to Whaitua Te Whanganui-a-Tara.	Delete the proposed amendments.
S101.034	5.2 and 5.3	Rule R54: Stormwate	Amend	Should the relief sought by the submitter with respect to Chapter 8 of the NRP not be accepted,	Retain application of these provisions to Whaitua Te Whanganui-a-Tara (by removing the symbol).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Discharges to land and water and land use rules	r from a port or airport - restricted discretionary activity.		the submitter opposes the proposed exclusion of these provisions as they relate to Whaitua Te Whanganui-a-Tara.	
S101.035	5.2 and 5.3 Discharges to land and water and land use rules	Rule R55: All other stormwater - discretionary activity.	Amend	Should the relief sought by the submitter with respect to Chapter 8 of the NRP not be accepted, the submitter opposes the proposed exclusion of these provisions as they relate to Whaitua Te Whanganui-a-Tara.	Retain application of these provisions to Whaitua Te Whanganui-a-Tara (by removing the symbol).
S101.036	5.2 and 5.3 Discharges to land and water and land use rules	Rule R101: Earthworks - permitted activity.	Amend	Should the relief sought by the submitter with respect to Chapter 8 of the NRP not be accepted, the submitter opposes the proposed exclusion of these provisions as they relate to Whaitua Te Whanganui-a-Tara.	Retain application of these provisions to Whaitua Te Whanganui-a-Tara (by removing the symbol).
S101.037	5.2 and 5.3 Discharges to land and water and land use rules	Rule R107: Earthworks and vegetation clearance - discretionary activity.	Amend	Should the relief sought by the submitter with respect to Chapter 8 of the NRP not be accepted, the submitter opposes the proposed exclusion of these provisions as they relate to Whaitua Te Whanganui-a-Tara.	Retain application of these provisions to Whaitua Te Whanganui-a-Tara (by removing the symbol).
S101.038	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies and the coastal marine	Amend	Supports the intent to improve the health of freshwater bodies and coastal marine area but considers "wai ora", as expressed in the objectives, cannot be achieved at the Airport due to its operational and functional requirements. Notes as examples: protecting the seawall surrounding the Airport is critical to the ongoing operational of the Airport and reverting the coast to its "natural character" would not be practicable in	Amend the Objective after reviewing the extent to which the objective should apply to sites containing critical infrastructure and whether such an objective is appropriate where it is also necessary to utilise natural and physical resources to meet the economic and social needs of Wellington's communities. Or delete and revert to Operative NRP.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.		this location, and restoration of freshwater bodies where located within the Airport site will potentially affect the ongoing operation and development of the Airport. Notes higher order planning documents (such as the NPS-FM and the NPS-IB) provide a path for specified infrastructure to undertake activities within freshwater bodies in accordance with the effects management hierarchy. Considers that the objective to be wai ora by 2100 should be qualified rather than absolute.	
S101.039	8 Whaitua Te Whanganui-a-Tara	Objective WH.O2: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora.	Amend	Supports the general intention of this objective but notes there are practical difficulties with an absolute requirement for wai ora to be achieved. Considers it important to recognise that the trajectory required by the objective is to be applied at a Whaitua or catchment wide level and that localised effects will not necessarily preclude the overall outcomes from being achieved. Note higher order planning documents (such as the NPS-FM and NPS-IB) provide a path for specified infrastructure to undertake activities within freshwater bodies (such as rivers and wetlands).	Amend the objective to clarify that the reference to the health and wellbeing of Te Whanganui-a-Tara is at a broad, regional level (and thus recognising that there may be localised effects arising as a result of specified infrastructure undertaking activities in rivers and wetlands. Review the extent to which the objective should apply to sites containing critical infrastructure and amend accordingly. Review whether such an objective is appropriate where it is also necessary to utilise natural and physical resources to meet the economic and social needs of Wellington's communities and amend accordingly. Or delete and revert to Operative NRP.
S101.040	8 Whaitua Te	Objective WH.O3:	Amend	Supports the general intention of this objective. Concerned that (g) and (h) do not recognise that for	Amend the objective to recognise that physical access will not be appropriate in all situations.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved to achieve the coastal water objectives set out in Table 8.1.		health and safety reasons it may not be appropriate to provide a physical connection to the coast. Considers the phrase "the health and wellbeing of coastal water quality" is unclear and considers the chapeau would be better articulated by relating the "health and wellbeing" component of the objective to ecosystems and health.	Amend the chapeau of the objective as follows: ~~The health and wellbeing of the c~~**Coastal** water quality, **and the health and wellbeing of** ecosystems and habitats in Te Whanganui-a-Tara is maintained and improved to achieve ...." At an overall level, review the extent to which the objective should apply to sites containing critical infrastructure and amend accordingly. Review whether such an objective is appropriate where it is also necessary to utilise natural and physical resources to meet the economic and social needs of Wellington's communities and amend accordingly. Or delete and revert to Operative NRP
S101.041	8 Whaitua Te Whanganui-a-Tara	Table 8.1 Coastal water objectives.	Support	Supports the coastal water objectives set out in Table 8.1.	Retain as notified.
S101.042	8 Whaitua Te Whanganui-a-Tara	Policy WH.P1: Improvement of aquatic ecosystem health.	Amend	Generally supports the intention of this policy but concerned that at an individual consent level, while endeavours are made to achieve (a) to (d), it may not always be practicable given the nature and scale of activities undertaken by regionally significant infrastructure. Considers the policy requires further amendment to recognise the operational and functional requirements of regionally significant infrastructure, 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.	Review the extent to which the policy should apply to sites containing critical infrastructure. 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. In the alternative, amend the policy to ensure it considers the extent to which (a) to (d) is practicable in the context of regionally significant infrastructure. Or delete and revert to Operative NRP.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S101.043	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Oppose	Considers the proposed policy is unduly onerous and blunt insofar as discharges and land use management are concerned and the chapeau of the policy needs to clarify that the target attribute states apply to freshwater only while the coastal water objectives apply to coastal water. Notes the definition of "unplanned greenfield development" makes reference to the undefined term "greenfield development" and "other greenfield development" and certainty is required around what is / is not captured by this policy. Considers it is not clear whether (a) would extend to infrastructure (such as Wellington Airport) or one-off developments for which resource consent can be sought. Considers if (a) were to apply to designations, it would render a well established and utilised tool under the RMA nugatory. Notes a proposal of WIAL to establish a small community precinct within an area of Open Space zoned land on Lyall Parade would effectively be prohibited under (a), despite the positive outcomes, including for the indigenous vegetation on site. Considers it is not clear what methods within the plan "encourage" redevelopment of existing urban areas. Considers it is not clear whether limb (c) relates to urban development which gives rise to stormwater discharges not otherwise discharging to rivers.	Amend the policy to address the issues raised. Or delete and revert to Operative NRP.
S101.044	8 Whaitua Te Whanganui-a-Tara	Policy WH.P5: Localised adverse effects of point source discharge.	Support	Considers the policy intent is generally consistent with restrictions on the grant of certain discharges under section 107 of the RMA.	Retain as notified.

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S101.045	8 Whaitua Te Whanganui-a-Tara	Policy WH.P6: Cumulative adverse effects of point source discharges.	Amend	Supports the general intent of the policy but considers the policy is drafted in a problematic way in that it requires avoidance of cumulative adverse effects and then subsequently, for a range of other outcomes to be achieved, which are seemingly less than the outright avoidance "standard" imposed by the policy at the outset.	Amend the policy as follows: The cumulative adverse effects of point source discharges, excluding stormwater network and wastewater discharges, to water are ~~avoided and~~ **managed such that:** And redraft the subsequent part of the policy to properly link with this chapeau. Or delete and revert to Operative NRP .
S101.046	8 Whaitua Te Whanganui-a-Tara	Policy WH.P8: Avoiding discharges of specific products and waste.	Oppose	Notes there are instances where discharges associated with the activities listed in (a) to (d) may occur at the Airport for the purpose of ensuring safe airport operations and emergency readiness. Provides examples of activities within (a) to (d) that present operational difficulties for WIAL including the use of chemicals to finish the cleaning process for any accidental fuel spills on site, the use of chemicals to maintain the protective coating on vehicles (Fire Rescue), and the use of de-icing fluids which enable aircraft to operate safely in cold temperatures. Notes that WIAL takes steps to minimise and effectively treat discharges arising from the above sources but residual discharges from these sources will likely remain. Considers this needs to be recognised within the policy.	Provide a discrete exemption for Wellington International Airport, or delete and revert to Operative NRP.
S101.047	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	Amend	Notes the current drafting in limb (b) appears to be more targeted at new, greenfield development. Notes that for the Airport it is not always practicable to implement water sensitive urban design or hydrological control measures and such measures can also lead to conflicts with the operational and regulatory requirements of the Airport. Notes that standing pools of water can provide a resting place or food source for birds and can pose a potential public health risk when located near a port of entry. Notes that International Civil Aviation Organisation ("ICAO") and the Civil Aviation Authority ("CAA")	Amend (b) as follows or include a similar reference that only applies to Wellington Airport or to regionally significant infrastructure. (b) using hydrological control and water sensitive urban design measures **where practicable** to avoid, remedy or mitigate adverse effects of stormwater quantity and maintain, to the extent practicable, natural stream flows, and Amend all limbs to use the term "where practicable". Consideration should be given to including this reference in the chapeau of the policy and removing it from the respective limbs (i.e. All stormwater discharges and associated land use activities shall be managed by, where

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				requirements require the Airport to undertake extensive wildlife management, including active management of birds and International Health Regulations 2005 require control of vector habitats around designated ports or entry, such as potential mosquito habitat.	practicable:) Or delete and revert to Operative NRP .
S101.048	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Amend	Notes stormwater discharges emanating from the Airport are provided for by a specific policy and rule in the Proposed NRP and to ensure consistent application of the policies and methods relating to industrial and trade premises, the proposed definition of "high risk industrial or trade premise" should specifically exclude activities occurring at the Airport.	Exclude the Airport from the definition of "high risk industrial or trade premise" or from this policy. Or delete and revert to Operative NRP.
S101.049	8 Whaitua Te Whanganui-a-Tara	Policy WH.P12: Managing stormwater from a port or airport.	Not Stated	Supports the overall intent of the policy and notes it is broadly similar to the operative equivalent (Policy P89). Concerned the policy is not clear of the circumstances in which the addition of the new "avoidance" directive within the policy would be engaged and is not aware, insofar as the Airport is concerned, of any issues arising from its discharge activities that would warrant an effective cessation of its continuance. Notes WIAL actively manages its discharges and considers the addition of the avoidance clause is unnecessary and should be removed from the policy.	Amend the policy as follows: The adverse effects, including on aquatic ecosystem health and mahinga kai, contact recreation and Māori customary use, of the discharge of stormwater from a port, or airport, where the discharge will enter water, including via a local authority or state highway stormwater network, shall be ~~avoided or~~ managed by:... Or delete and revert to Operative NRP.
S101.050	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new	Oppose	Refers to submission points raised with respect to Policy WH.P2: "new greenfield development", noting "existing urban areas" and "redevelopment" are not defined terms. Considers it is not clear how this policy is intended to interact and be applied in light of Policies such as	Specifically exclude application of the policy to Airports (and possibly Ports) as they are already captured by proposed Policy WH.P12 and Operative Policy 89. Amend the chapeau to read "... through implementing, **as far as reasonably practicable"**: to recognise that (a) and (b) do not fit well with other forms of development, such as

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and redeveloped impervious surfaces.		WH.P12 which relate to airports and the broader objectives applying to regionally significant infrastructure more broadly (such as Objective O9 and O10).	regionally significant infrastructure. Or delete and revert to Operative NRP.
S101.051	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Oppose	Refers to submission on WH.P2 and Policy WH.P14 and the rationale for excluding the Airport from the definition of "new greenfield development" and related terms. Notes the operational and functional requirements of some regionally significant infrastructure necessitate large impermeable surfaces which stormwater management systems are designed into. Considers the policy will potentially result in "double dipping", with financial contributions already able to be considered by Wellington City Council via the resource consent, building consent and service connection process. Notes residual effects of an activity are typically considered during the resource consent process and if the effects on the environment are suitably managed, it is inappropriate to require all residual effects to be offset by financial contribution. Considers Schedule 30 financial contributions are payable for an effect that does not necessarily arise from the discharge consent is being sought for which is inappropriate and unlawful. Considers it is unduly onerous to require financial contributions for residual effects from the Airport given the significant contribution it makes towards the social and economic wellbeing of the community. Notes there is no definition of "new greenfield development therefore application of this policy is unclear, uncertain and inappropriate.	Expressly exclude the regionally significant infrastructure or other development of Open Space Zones that are generally consistent with the outcomes of the zone from the definition of "new greenfield development" and associated definitions. Exclude the Airport from any financial contributions set out in this policy and Schedule 30. Or delete and revert to Operative NRP.
S101.052	8 Whaitua Te	Policy WH.P16:	Oppose	Refers to submission on WH.P2 and WH.P14. Concerned that such a strong policy directive could	Amend the policy to address the issues raised. Or delete and revert to Operative NRP.

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	Whanganui-a-Tara	Stormwater discharges from new unplanned greenfield development.		be used as rationale by a territorial authority for declining plan changes and resource consents or for recommending that a Notice of Requirement is withdrawn, despite regionally significant infrastructure often being subject to a different consent/approval process than most activities.	
S101.053	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated	Considers "Rural land use" and "earthworks" are distinctly different activities. Notes that if the provisions within this section are intended to only apply to earthworks associated with rural land use activities, consideration should be given to separating these provisions out into different sections of the NRP.	Not stated
S101.054	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Oppose	Considers it is impractical to expect sediment discharges to be entirely retained on site given the nature and location of works on the WIAL site (ie. at the coastal interface).	Amend the policy to make it clear that it applies only to Rural land use in line with this section of the proposed RPS. Or establish a standalone policy (and rule) that provides for earthworks associated with the Airport or alternatively, regionally significant infrastructure more broadly. Or delete and revert to Operative NRP.
S101.055	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose	Opposes the policy as it does not provide a consenting pathway for large scale infrastructure projects that can span months to years in duration. Considers prohibiting earthworks for a four month period will add significant cost and time to infrastructure projects undertaken by WIAL and likely other infrastructure providers and fails to recognise that some earthworks activities have to avoid certain breeding, spawning or nesting periods if significant indigenous fauna are located on site. Considers that when such constraints are combined with the policy directive to avoid the period 1 June to 30 September, implementation of projects may become unworkable.	Establish a standalone policy (and rule) that provides for earthworks associated with the Airport or regionally significant infrastructure more broadly. Or delete and revert to Operative NRP.
S101.056	8 Whaitua Te	Rule WH.R1: Point	Oppose	Opposes the rule for the reasons set out in submission on Policy WH.P8. Notes WIAL has a site wide stormwater discharge permit which	Provide an exemption for activities occurring at the Airport. Or delete and revert to Operative NRP.

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	Whanganui-a-Tara	source discharges of specific contaminants - prohibited activity.		requires activities on site to be managed in accordance with the site wide stormwater management plan and the effects arising as a result of such activities is therefore appropriately managed via that plan.	
S101.057	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Amend	Considers a clarification note should be included in this rule (as per Rule WH.R3) which clearly identifies that this rule does not apply to discharges from the Airport.	Amend the rule as follows or similar: The discharge of stormwater onto or into land, including where contaminants may enter groundwater: (a) that is not from a high risk industrial or trade premise, or (b) **that is not from a port, airport or state highway** (c) .....Note In respect of a discharge from an existing high risk industrial or trade premise refer to Rule WH.R4, and for discharges from new or redeveloped premises refer to Rule WH.R11. For existing discharges from or into a local authority stormwater network refer to Rule WH.R9. **Discharges from a port or airport refer to Rule WH.R8.** Or delete and revert to Operative NRP.
S101.058	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Support	Notes Rule WH.R8 applies to stormwater discharges from Wellington International Airport and therefore supports the clarification provided by (b) and the related note.	Retain as notified.
S101.059	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an existing high risk	Amend	Considers a clarification note should be included in this rule (as per Rule WH.R3) which clearly identifies that this rule does not apply to discharges from the Airport.	Amend the rule as follows: For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		industrial or trade premise - permitted activity.			to WH.R11. **Discharges from a port or airport refer to Rule WH.R8.** Or delete and revert to Operative NRP.
S101.060	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Oppose	For the reasons set out in submission on Policy WH.P2 and Policy WH.P12, submitter opposes this rule. Considers that Rule WH.R8 applies to stormwater discharges from Wellington International Airport. Considers a clarification note should be included in this rule (as per Rule WH.R3) which clearly identifies that this rule does not apply to discharges from the Airport.	Amend the rule to address the issues raised in the discussion regarding Policy WH.P2 and Policy WH.P12. Amend the note as set out below to address discharges from the Airport (and potentially the port): Note Where a property connects to a local authority stormwater network, additional connection requirements and authorisations may be required by the network utility operator. For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to WH.R11. **Discharges from a port or airport refer to Rule WH.R8.** Or delete and revert to Operative NRP.
S101.061	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Oppose	For the reasons set out in submission on Policy WH.P2 and Policy WH.P12, submitter opposes this rule. Considers that Rule WH.R8 applies to stormwater discharges from Wellington International Airport. Considers a clarification note should be included in this rule (as per Rule WH.R3) which clearly identifies that this rule does not apply to discharges from the Airport.	Amend the rule to address the issues raised in the discussion regarding Policy WH.P2 and Policy WH.P12. Amend the note as set out below to address discharges from the Airport (and potentially the port): Note For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to WH.R11. **Discharges from a port or airport refer to Rule WH.R8.** Or delete and revert to Operative NRP.
S101.062	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas -	Oppose	For the reasons set out in submission on Policy WH.P2 and Policy WH.P12, submitter opposes this rule. Considers that Rule WH.R8 applies to stormwater discharges from Wellington International Airport. Considers a clarification note should be included in this rule (as per Rule WH.R3) which clearly identifies that this rule does not apply to discharges from the Airport.	Amend the rule to address the issues raised in the discussion regarding Policy WH.P2 and Policy WH.P12. Amend the note as set out below to address discharges from the Airport (and potentially the port): Note For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to Rule WH.R11. **Discharges from a port or airport refer to Rule WH.R8.** Or delete and revert to Operative NRP.

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		controlled activity.			
S101.063	8 Whaitua Te Whanganui-a-Tara	Rule WH.R8: Stormwater from a port or airport - restricted discretionary activity.	Amend	Considers it is appropriate for the Proposed NRP to retain a bespoke consenting pathway for the Airport as regionally significant infrastructure due to unique operational and functional requirements which mean that standard stormwater management measures are not practical in the operational context of an airport, nor given the land constraints at the Airport. Considers these constraints require further recognition within the matters of discretion, in particular paragraph 4 relating to hydrological controls and water sensitive design.	Retain the rule as notified, subject to the following amendments: Matters for discretion 1. The management of the adverse effects of stormwater capture and discharge,including on aquatic ecosystem health and mahinga kai, contact recreation and Māori customary use, and as required by Policy WH.P12 2. The management of effects on sites identified in Schedule A (outstanding waterbodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (indigenous biodiversity) ~~3. Minimisation of the adverse effects of stormwater discharges.~~ 4. **Where practicable, the provision** for hydrological control measures where discharges will enter a surface water body (including via an existing local authority stormwater network), and water sensitive urban design 5. Requirements of any relevant local authority stormwater network discharge consent 6. **The operational and functional constraints of the port or airport that affect the stormwater management approach adopted on site.** Or delete and revert to Operative NRP.
S101.064	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Oppose	For the reasons set out in submission on Policy WH.P2 and Policy WH.P12, submitter opposes this rule. Considers that Rule WH.R8 applies to stormwater discharges from Wellington International Airport. Considers a clarification note should be included in this rule (as per Rule WH.R3) which clearly identifies that this rule does not apply to discharges from the Airport.	Amend the rule to address the issues raised in the discussion regarding Policy WH.P2 and Policy WH.P12. In addition, amend the note as set out below to address discharges from the Airport (and potentially the port): **Note Discharges from a port or airport refer to Rule WH.R8.** Or delete and revert to Operative NRP.
S101.065	8 Whaitua Te	Rule WH.R12: All other	Oppose	For the reasons set out in submission on Policy WH.P2 and Policy WH.P12, submitter opposes this rule. Considers that Rule WH.R8 applies to	Amend the rule to address the issues raised in the discussion regarding Policy WH.P2 and Policy WH.P12. In addition, add a note as set out below to address

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	Whanganui-a-Tara	stormwater discharges - non-complying activity.		stormwater discharges from Wellington International Airport. Considers a clarification note should be included in this rule (as per Rule WH.R3) which clearly identifies that this rule does not apply to discharges from the Airport.	discharges from the Airport (and potentially the Port): **Note Discharges from a port or airport refer to Rule WH.R8.** Or delete and revert to Operative NRP.
S101.066	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	For the reasons set out in submission on Policy WH.P2, submitter opposes this rule.	Amend to address the issues raised in the discussion regarding Policy WH.P2 and Policy WH.P12. Or delete and revert to Operative NRP.
S101.067	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Oppose	Notes the rule may inadvertently be breached where an activity is not related to farming. Notes subparagraphs (d) and (e) appear to be addressing the same issue and could be combined. For the reasons set out with respect to Policy WH.P29 in the submission, submitter is concerned with the proposed drafting of subparagraph (g) and considers that it is impractical to require all discharges to be entirely retained on site.	Amend the rule as follow: Earthworks is a permitted activity, provided the following conditions are met: (a) **where** the earthworks are **related to farming they** ~~to~~ implement an action in the erosion risk treatment plan for the farm, or (b) **where** the earthworks are **related to farming they** ~~to~~ implement an action in the farm environment plan for the farm, or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and ~~(e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and~~ (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and ~~(g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto~~

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					~~land that may enter a surface water body or the coastal marine area, including via a stormwater network, and~~
S101.068	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Oppose	Considers it is not clear how (a) relates to coastal water when the visual clarity indicators only relate to freshwater bodies. For the reasons set out with respect to Policy WH.P31 in the submission, the submitter opposes subparagraph (b) and matter of discretion 8 and considers they should both be deleted in their entirety. Considers s separate restricted discretionary earthworks rule should apply to large scale earthworks that provide for regionally significant infrastructure.	Include a new rule that specifically provides for earthworks associated with the establishment, operation or maintenance of regionally significant infrastructure. Or delete and revert to Operative NRP..
S101.069	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Oppose	Notes most of submitters earthwork activities will be captured by this rule. For the reasons set out in submission on Policy WH.P31, the submitter opposes the rule and considers it should be deleted in its entirety. As an alternative, considers that a separate restricted discretionary earthworks rule should apply to large scale earthworks that provide for regionally significant infrastructure.	Develop a new restricted discretionary earthworks rule should apply to large scale earthworks that provide for the establishment, operation or maintenance of regionally significant infrastructure that does not include a close down period. Or delete and revert to Operative NRP.
S101.070	12 Schedules	Schedule F2c: Significant habitats for indigenous birds in the coastal marine area.	Oppose	Notes the "Habitat Extent" as described in the Schedule only excludes the Southern Seawall but the description should be updated to also exclude the Western Seawall. Notes the section 32 evaluation cites that the schedules relate to objectives that give effect to the NPS-FM but the NPS-FM does not apply to coastal waters. Submitter questions the rationale for the change to Schedule F2c, particularly with respect to Wellington Harbour - (Port Nicholson) foreshore; Palmer Head to Lyall Bay excluding the seawall at the southern end of the Wellington International Airport as shown on the NRP GIS maps and Wellington Harbour (Port Nicholson) - inland waters.	Amend Schedule F2(c) as follow: Wellington Harbour (Port Nicholson) foreshore; Palmer Head to Lyall Bay excluding the seawall at the southern **and western** end of the Wellington International Airport as shown on the NRP GIS maps. Delete proposed changes to the identifies species list within Schedule F2(c) and renotify with an accompanying evaluation that meets the requirements of section 32 of the RMA. Evidence should also be provided that the mapped areas are sufficiently accurate for inclusion the Proposed NRP. References to "the site" should be replaced with "Overall the Harbour provides" or "Part of the Harbour provides" to reflect the size of the area. Or delete the changes to Schedule F2(c) that relate to the CMA.
S101.071	12 Schedules	Schedule F4: Sites with	Amend	Acknowledges the presence of these indigenous species within Evans Bay and notes Policies 38, 39 and P41 of the Operative NRP provides a pathway	Amend the Schedule and associated planning map to accurately map the extent of the mussel beds. Reconsider

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		significant indigenous biodiversity values in the coastal marine area.		for regionally significant infrastructure to undertake works within these areas. Provided these operative provisions are not amended in any way as part of the Proposed NRP, submitter does not have any particular issue with the Horse mussel beds and Adamisella beds being identified in Schedule F4, subject to the mapping being sufficiently accurate.	the use of the NZCPS icon given the "regionally rare" status.
S101.072	12 Schedules	Schedule F5: Habitats with significant indigenous biodiversity values in the coastal marine area.	Amend	Acknowledges the presence of these indigenous species within Evans Bay and notes Policies 38, 39 and P41 of the Operative NRP provides a pathway for regionally significant infrastructure to undertake works within these areas. Provided these operative provisions are not amended in any way as part of the Proposed NRP, submitter does not have any particular issue with the Horse mussel beds and Adamisella beds being identified in Schedule F4, subject to the mapping being sufficiently accurate.	Amend the Schedule and associated planning map to accurately map the extent of the habitats. Reconsider the use of the NZCPS icon given the "regionally rare" status.
S101.073	12 Schedules	Schedule 29: Stormwater Impact Assessments.	Not Stated	Opposes this schedule to the extent that submitters relief sought for WH.R6 and WH.R7 are not granted.	Delete the schedule to the extent that it should not apply to the Airport. Amend the schedule to recognise that the measures identified will not always be practicable. For example A stormwater impact assessment shall include the following analysis **where relevant:** Implementation of Water Sensitive Urban Design principles **to the extent reasonably practicable:** Or delete and revert to Operative NRP.
S101.074	12 Schedules	Schedule 30: Financial Contributions.	Oppose	For the reasons set out in submission on WH.P15, submitter opposes this schedule in its entirety.	Delete Schedule 30.

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S151.001	General comments	General comments - stormwater management	Amend	Concerned the PC1 policies and rules are not sufficiently enabling, and in some instances are not feasible to implement.	Amend policies and rules to: Cleanly provide for stormwater and wastewater discharges from local authority networks as a restricted discretionary activity, without this status being jeopardised by subjective assessments of the merits of the SMS or WNCIS, or non-complying activity rules in other parts of the NRP. Provide guidance on the matters to be considered in prioritising sub-catchments for improvement works, while also ensuring sufficient flexibility to take account of practical matters such as investment availability and efficiencies and alignment with other workstreams (including wastewater improvement works). Allow matters of detail to be specified in sub-catchment SMPs and SIPs, rather than in the initial SMS and WNCIS. Provide flexibility for determining the load reductions required in order to appropriately contribute to meeting the TAS (in light of our present concerns with the TAS, lack of information as to baseline states in many cases, and the uncertainty around the 'commensurate reduction' wording and whether this is realistic (i.e. properly within Wellington Water's control) for all attributes). Provide for dry weather discharges (such as dry weather overflows and exfiltration) to be managed via a 'responsive management approach' rather than with reference to the TAS (due to the current inability to forecast dry weather overflows or assess the correlation between dry weather discharges within the control of Wellington Water and TAS being achieved). Other relief as may be required to address the issues

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					identified, including relief that is alternative, additional or consequential.
S151.002	General comments	General comments - stormwater management	Amend	Supports a restricted discretionary activity status and the preclusion of public notification for stormwater and wastewater discharges from the local authority networks. However, concerned with the current drafting of the rules which may undermine the Restricted Discretionary status and create uncertainty due to a pre-requisite or 'condition' requiring the activity be accompanied by a strategy prepared 'in accordance with' (as relevant) Schedules 31 or 32. Considers this framing and the subjective wording could invite debate as to whether the relevant strategy is 'in accordance' with them and whether Restricted Discretionary status applies. Also considers this approach is too uncertain for the activity status, and duplicates the substantive assessment of the applications Notes there are further rules in the NRP that should not apply to discharges (e.g. R93 and R120) from the local authority networks and that operative rules such as those relating to sites of significance and wetlands, and the National Environmental Standard for Freshwater, would continue to apply to any stormwater or wastewater discharge from the network. Considers these other less specific rules would undermine the restricted discretionary activity status proposed in PC1 for network discharges. Considers this cannot have been intended, noting the effects on sites of significance being included within the matters of discretion under the new restricted discretionary rules suggests this.	Amend rules for stormwater and wastewater discharges from the local authority networks (and/or the associated Schedules) so that they refer to objective information requirements rather than inviting a detailed assessment against the schedules to determine activity status; and All amendments necessary (including disapplying rules in other parts of the NRP) to ensure that the wastewater and stormwater from local authority networks remain a restricted discretionary activity, and the associated rules in PC1 function as a 'one stop shop' in the relevant whaitua. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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S151.003	General comments	General comments - target attribute states	Oppose	Opposes the provisions relating to TAS and Coastal Water Objectives (CWO) in full. Considers there is a general lack of information relating to the baseline state to measure against, meaning it is not possible to determine whether the TAS parameters and requirements are reasonable, appropriate and achievable. Considers the CWO in Table 8.1 are generally appropriate parameters for coastal environmental health, but concerned the lack of information relating to baseline states and timeframes to meet requirements makes it difficult to determine whether improvement is measurable. Considers it is unclear how the TAS and CWO provisions will be assessed and measured. Considers the provisions do not currently recognise the complexities and contributing factors for achieving TAS and that meeting TAS for network discharges cannot wholly sit with Wellington Water as there are many factors within catchments that contribute to water quality, and the provisions do not reflect the magnitude of work involved in delivering water quality improvement. Considers the uncertainty and lack of information in the provisions regarding the baseline state means that Wellington Water cannot undertake a full assessment of the potential impact that the TAS/CWO provisions will have on their discharge consent applications and the prioritisation and implementation of sub-catchment improvements. Considers it is likely that the TAS 2040 timeframe (particularly as it relates to E. coli), will result in the requirement for a large proportion of sub-catchments (or possibly all of them) to be upgraded in the short term. As such, undertaking a prioritisation exercise and implementing the sub-catchment management plans for stormwater and wastewater could be rendered meaningless. This is unlikely to allow for progressive improvement, or for	The plan change include guidance or provisions that outline how proportional contribution to meeting the TAS can be demonstrated, and more realistic timeframes in the relevant TAS tables. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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				practicable implementation. Seeks further discussions with Greater Wellington on this matter, particularly around a more detailed assessment of the implications of the TAS and CWO provisions on a sub-catchment basis and a clear understanding of how these would be addressed in a resource consent application.	
S151.004	General comments	General comments - target attribute states	Oppose	Considers the scale and volume of work necessary between now and 2040 to achieve the necessary reduction in wet weather wastewater overflows, dry weather wastewater discharges and stormwater contamination is significant. Retrofitting the urban areas of four cities to also address environmental outcomes will take decades of planning, designing and construction. Acknowledges this work needs to be done but 17 years (between now and 2040) is insufficient to achieve this. Considers that delivery of the network discharges programme at such a fast pace will impact on delivery of other important work programmes for Te Mana o te Wai such as storage lakes for drinking water supply to support increased minimum flows, wastewater treatment plant upgrades and the renewals programmes for both wastewater and water supply.	Amend all timeframes associated with TAS from 2040 to 2060. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.005	General comments	General comments - earthworks	Oppose	Considers the winter shutdown for earthworks will make delivery of any large-scale programme of work impracticable.	Seeks an exemption for regionally significant infrastructure from the winter shutdown for earthworks
S151.006	General comments	General comments - water bodies	Support	Generally supportive of the requirement to provide methodologies to prioritise sub-catchment upgrades or improvements as part of consent applications for stormwater network discharges and wastewater network discharges. Considers it appropriate that prioritisation methodologies, rather than the actual order of sub-catchments, are provided as part of the Wastewater Network Catchment Improvement	Matters to be considered when setting the prioritisation, or sequence, of sub-catchments should be listed (or cross-referred to) within: -Policy WH.P13 (stormwater) -Policy WH.P19 (wastewater) -Policy P.P12 (stormwater) -Policy P.P18 (wastewater)

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				Strategy (WNCIS) and Stormwater Management Strategy (SMS). Considers that the prioritisation should be done in an integrated manner considering both stormwater and wastewater discharges concurrently and would be done with investors and mana whenua in a collaborative manner. Considers the range of factors that should influence prioritisation is greater than currently indicated within the plan change provisions. Refers to figures that illustrate some of the matters identified within the plan change provisions that require prioritisation in respect of wastewater and stormwater network discharges on a sub-catchment basis, and the impact that the provisions as currently drafted may have in terms of requiring prioritisation. Notes this does not take into account broader matters that Wellington Water considers are necessary to ensure deliverability and implementation of sub-catchment upgrades and improvements. Considers prioritisation should be undertaken in a more integrated manner so wastewater and stormwater discharges are upgraded at the same time for each sub-catchment. Concerned the number of provisions that could influence the prioritisation of sub-catchments for improvements is overly complicated and lacks clear direction. Considers prioritisation requirements should be made clearer in the plan change. Considers matters such as efficiency of delivery, investment availability and allocation are considered during the process of prioritisation, to allow alignment with other work programmes and to ensure an integrated approach.	Provisions within the plan change that specifically use the terminology 'prioritise' or 'prioritisation', or otherwise speak to the relative urgency of improving or enhancing certain values (other than those mentioned above), are redrafted to make it clear that they do not apply to applications for stormwater and wastewater network discharges Consider the wording of provisions as they relate to varying levels of requirements such as 'avoid' or 'protect' in terms of the level of importance represented by the provisions, and how this could be considered to influence decision making on a prioritisation methodology. Ideally, these provisions would not apply to stormwater and wastewater network discharges either. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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				Considers the TAS requirements in PC1 would render the process of prioritising sub-catchments for improvement or upgrade meaningless due to the requirements to meet 2040 targets, and the use of terminology such as 'reasonable timeframes' within other provisions of PC1 creates additional uncertainty in relation to the prioritisation exercise. Refers to Schedule C of submission where examples of provisions that may influence prioritisation methodologies have been identified.	
S151.007	General comments	General comments - target attribute states	Oppose	Acknowledges the need for improvements or reductions that are commensurate with or proportionate to the effects of the relevant discharge on the attribute state of the receiving environment. Concerned that as worded these requirements are ambiguous, because it is not clear whether they mean a reduction in contaminant load that reflects the effect of the discharge on the receiving environment (which would require modelling/technical assessment), or a percentage reduction in all cases that reflects the percentage difference between the TAS and the baseline state of the receiving environment. Notes the second interpretation may be unduly onerous where it does not reflect the actual contribution of the relevant discharge, while the first interpretation would require Wellington Water to acquire information or assessment tools that are not currently available. Notes that Wellington Water does not currently have access to the data or analytical tools required to assess the correlation between contaminant load out of a pipe and contaminant concentrations in the receiving environment, but is able to model the contaminant load (e.g. total kilograms of copper and	Seeks that: -All requirements to determine 'commensurate' reductions at the application stage are removed, and that different wording is used to acknowledge that in some cases 'at source' reductions are not within the applicant's control (for example, the reduction of copper in stormwater, as acknowledged in the section 32 report) -The requirements to make reductions in order to contribute to meeting the TAS in relation to wastewater are confined to wet weather overflows (and then only the 95th percentile), with dry weather overflows and exfiltration subject to a separate responsive management regime; ~~-Amend-~~ PC1 is amended to either include load reduction targets for Te Whanganui-a-Tara and for other parameters, or to provide clear directions as to how Wellington Water (and other applicants) can demonstrate their contribution to achieving TAS; ~~-Amend-~~ the methods and/or Schedule 27 (Freshwater Action Plan requirements) are amended to confirm that the modelling and monitoring to facilitate the identification of load reduction targets in SMPs and SIPs will be undertaken by Greater Wellington; and/or -In the alternative, should the "commensurate" wording be retained in PC1, that this term is defined and/or guidance provided in the policies to ensure it reflects reductions that are both proportionate to the effects of the discharges on the TAS in question, as well as the extent to which reductions

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				zinc from the stormwater network). Notes concentrations in the receiving environment is dependent on factors such as stream flows and ocean currents (which affect dilution and therefore concentration). Subject to the targets being realistic, supports PC1 including clear targets for load reductions in the discharge, rather than unclear formulas such as "commensurate". Considers what is realistically achievable through stormwater network discharge mitigations is not reflected by the proposed references (in other parts of PC1) to reductions "commensurate to achieving" the TAS, which would suggest that Wellington Water needs to reduce copper by much more than 15%, for the TAS to be achieved. Seeks to understand what actions were considered to be realistically achievable through stormwater network discharge mitigations, which is not clear from Greer 2023, but is obviously a critical determinant for setting of the TAS. States that determining targets for load reductions both the extent to which the discharge load contributes to achieving (or not achieving) the TAS the extent to which this is realistically within Wellington Water's control need to be considered. Notes the analysis has not yet been undertaken for stormwater catchments beyond Porirua, or for E. coli or enterococci in relation to wastewater. Unless or until that work has been carried out and Wellington Water considers the outcomes reasonable, submitter does not support the "commensurate reductions" wording in PC1. Considers it is not realistic to require confirmation of load reduction targets as part of the application	are reasonably within the control of the applicant. A definition is proposed in Section B of this submission. A new method needs to be included in PC1 for Greater Wellington to provide the necessary analytical tools to determine the correlation between contaminant load out of a pipe and contaminant concentrations in the receiving environment if PC1 is reliant on this assessment. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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				documentation. At most, this could be determined at the sub-catchment planning stage, with the high level strategies required under Schedules 31 and 32 instead specifying the intended methodology or approach for determining this. Considers these assessments will require state of the environment information and/or modelling that is not available to Wellington Water. Expectation is that Greater Wellington will be producing the modelling necessary for Wellington Water to determine the appropriate (or 'commensurate') load reduction targets. Considers it is not realistic to require confirmation of load reduction targets as part of the application documentation. At most, this could be determined at the sub-catchment planning stage, with the high level strategies required under Schedules 31 and 32 instead specifying the intended methodology or approach for determining this. Considers these assessments will require state of the environment information and/or modelling that is not available to Wellington Water and expects Greater Wellington will be producing the modelling necessary for Wellington Water to determine the appropriate (or 'commensurate') load reduction targets. Considers there are additional complexities in ascertaining the contribution of dry weather overflows and exfiltration to achieving the TAS as discharges can be from a private cross connection that are not a matter within Wellington Water's control and Wellington Water does not model cross connections because they are an aberration. Seeks that rather than a requirement to reduce dry weather overflows and exfiltration to contribute to	

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				meeting the TAS they be subject to a separate 'responsive management' programme.	
S151.008	General comments	General comments - stormwater management	Amend	Supports the recognition of the role of modelling in PC1 as an analytical tool, including to assess the performance of the wastewater and stormwater networks and compliance with associated consent requirements. Considers PC1 will require Wellington Water to undertake significantly more modelling than it already does which in some cases will be onerous with no additional benefit in predicting load reductions or E. coli reductions. Notes Schedule 32 appears to require the full wastewater network to be modelled as part of preparing the WNCIS but considers this will not improve the understanding of overflows beyond that provided by the current 'Strategic Model'. Concerned requiring SMS be guided by modelling and monitoring will place an unreasonably high burden on consent holders. Considers that any receiving environment modelling should be undertaken by Greater Wellington, including state of the environment modelling which is required to ascertain the baseline state for identified attributes. Notes PC1 repeatedly refers to modelling of load as well as concentration of contaminants (WH.P19 and P.P18)but concentration cannot be easily or accurately modelled, and would not provide valuable insight. Considers the focus should be on modelling and managing contaminant load, not concentrations. Notes Wellington Water can undertake modelling for contaminant loads and is looking into models such as the 'Contaminant Load Model' (CLM) and 'Medusa' for that purpose, but ascertaining the load	PC1 be amended to remove unnecessary modelling requirements which are currently to be undertaken by the consent holder; Greater Wellington be responsible for all state of the environment modelling; and Reference to modelling 'concentrations' are removed. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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				reductions necessary to achieve (or contribute to achieving) the TAS will also require the use of receiving environment models such as the 'Fresh Water Management Tool' (FWMT), which is a project that should be undertaken by Greater Wellington. Notes Wellington Water is also not able to model E. coli or enterococci concentrations or load, and instead must use the wet weather discharge frequency as a proxy for this.	
S151.009	General comments	General comments - stormwater management	Amend	Supports a partnership between Greater Wellington and consent holders for monitoring stormwater and wastewater discharge effects but considers more definition is required about was each party is responsible for. Submitter is implementing a monitoring plan under their Stage 1 Global Stormwater consent to develop a baseline of information on effects of discharges from the network on receiving environments. The monitoring plan will then be revised to provide an integrated receiving environment approach for the network discharges. It is expected that any broader state of the environment monitoring will be undertaken by GWRC and this is the most appropriate approach to monitoring which should be reflected in PC1. Concerned that the PC1 provisions may envisage or require more monitoring to inform the wastewater and stormwater modelling than is actually necessary (or may be necessary in future).	Amend PC1 to: -Clearly indicate what monitoring consent holders are responsible for; and -Clarify that Greater Wellington is responsible for all state of the environment monitoring. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.010	General comments	General comments - fresh water	Amend	Unclear on how the FAPs are intended to operate alongside other provisions within PC1, Wellington Water stormwater and wastewater network discharge consents, and in general Wellington Water's network operations.	Requests clarification on how the FAP provisions will work alongside existing TAS provisions, network discharge consent provisions, and in particular Schedules 31 and 32. Request clarification about what is intended in terms of the level of consideration or influence that any FAP could have

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				Considers the current provisions for FAPs (cites Method 35 and Schedule 27 as examples), although a non-regulatory 'other method', could be read to have some level of influence in relation to wastewater and stormwater network discharge consents and prioritisation of sub-catchments.	on wastewater and stormwater network discharge consents. There should be no relationship between the contents of a FAP and the scheduled requirements for network discharge consents. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.011	General comments	General comments - stormwater management	Amend	Supports the requirement for hydrological controls for land uses that create new, or redevelop existing, impervious surfaces. Supports a consistent definition for hydrological controls between the NRP and the Regional Policy Statement (RPS). Promotes a cascading approach to addressing hydrological control in the RPS and NPS; with the RPS setting a regional requirement for hydrological controls and the detail of hydrological control standards being set by the NRP. Considers the NRP provisions merely re-state the requirement for hydrological controls and are considerably less specific than corresponding provisions proposed for inclusion in the RPS PC1. Would support standards based on a specified depth of rainfall retention (e.g. retention of the first 5mm of rainfall depth).	Amend relevant provisions in the NRP to contain clear, detailed and specific direction regarding the hydrological control standards to be met. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.012	General comments	General comments - definitions	Amend	Generally supports the new definitions in PC1, and refinements have been sought for specific definitions. Specifically notes support for the intent of the following definitions: 'Existing wastewater discharge' - it is important that this definition facilitates integrated management of the wastewater network (and discharges from it), but avoids a fragmented approach where additional consents need to be sought. The definition needs to remain broad enough to include new discharge locations created as part of improvement works or instances where an uncontrolled overflow point is	Not stated

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				replaced with a new constructed overflow point. 'Containment standard' - the definition is consistent with the approach adopted in the submitter's wet weather overflow applications. Achievement of containment standards should be assessed by reference to average annual weather conditions (as simulated by a computer model) rather than by reference to the actual number of wet weather overflow events in a given year.	
S151.013	General comments	General comments - stormwater management	Amend	Considers provisions in PC1 to manage contaminants discharged to groundwater are inconsistent and unclear and place too much focus on stormwater. For example: -Policy WH.P7 discharges to groundwater is a holistic policy, however it is not carried through to all relevant activities. -Rule R48 Stormwater from individual property - does not mention any effects on groundwater. -Rule WH.R3 Stormwater from individual property - does not mention any effects on groundwater. -Rule WH.R4 Stormwater from existing high risk premise - limits the effects on groundwater to potable water or stock water. -Rule R51 Stormwater to land permitted - limits the effects on groundwater to potable water or stock water. -Rule WH.R2 Stormwater to land - limits the effects on groundwater to potable water or stock water. -s5.1.13 general conditions - there is no mention of discharge to groundwater. -Policy P73 Farm plans - no mention of minimising contamination of groundwater even though farming is a known major contributor in many areas of Aotearoa New Zealand. -Rule R54 Stormwater from ports - does not include discharge to groundwater. -Schedule 31 - Local authorities need to address effects on groundwater as part of the SMS. Policy	Seeks greater clarity of the approach to managing groundwater, including increased focus on recognised and accepted effects from activities, rather than just activities. Alternatively, discharges of contaminants from the stormwater and wastewater network (other than from a Wastewater Treatment Plant (WWTP)) should be managed by capping, minimising and reducing loads so they do not increase over time and where TAS are exceeded, the reduction is to the extent reasonably practicable. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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				WH.P21 and P22 refer to "capping, minimising and reducing", not increasing over time and where TAS are exceeded reductions are "to the extent reasonably practicable". This is very different to the expectations for stormwater and wastewater from local authority networks	
S151.014	General comments	General comments - overall	Amend	Where a position has not been expressed, and no alternative, additional or consequential changes have been sought to address an issue, the stormwater and wastewater provisions are supported as notified	Not stated
S151.015	General comments	General comments - current legislation	Not Stated	Notes the new coalition government has signalled a number of changes to national policy direction on freshwater including the replacement of the current National Policy Statement for Freshwater Management 2020 (NPS-FM).	Seeks all changes to PC1 that are necessary to give effect to changes to the NPS-FM or its application, should such changes be progressed while PC1 is being considered.
S151.016	2 Interpretation	Containment standard	Support	Supports the definition as it is consistent with the approach taken in Wellington Water's applications to date	Retain as drafted, or ensure that any changes preserve the approach of: 1) referring to each discharge location, rather than the whole network, and 2) assessing compliance by reference to average annual weather conditions (as simulated by a computer model) rather than by reference to the actual number of wet weather overflow events in a given year. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.017	2 Interpretation	Dry weather discharges	Amend	Broadly supports definition, but suggests minor changes to clarify that dry weather discharges and wet weather overflows are to be distinguished by their cause rather than whether it is raining. Considers it is technically possible to have a 'dry weather' overflow. Recommends that the cross connections aspect of this definition should be limited to those in public ownership.	Amend definition as follows: Constructed or uncontrolled discharges of wastewater from a wastewater network or stormwater network **that are not attributable to wet** ~~occur during dry~~ weather, ~~often~~ **generally** as a result of pipe blockage, pipe breakage, cross-connections **in the publicly-owned network** or mechanical or power failure, ~~in a network during periods of dry weather.~~ Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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S151.018	2 Interpretation	Earthworks	Oppose	Supports the earthworks definition regarding the areas that fall outside Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua. Considers the removal of exclusions for earthworks in Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua will result in a large number of consents for minor earthworks activities in these areas, including in relation to three waters infrastructure. Considers this is likely to have a significant and prohibitive impact on Wellington Water's ability to repair and maintain its network in a timely and cost effective manner.	Retain the proposed earthworks definition (outside Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua) across the full region and delete the earthworks definition which relates to Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua. Proposed definition revisions as follows: Earthworks ~~For Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua only: The alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, and disturbance of land for the installation of fence posts. Except that, for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20, 'earthworks' has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.~~ ~~For all other whaitua:~~ The disturbance of a land surface from the time soil is first disturbed on a site until the time the site is stabilised. Earthworks includes blading, contouring, ripping, moving, removing, placing or replacing soil or earth, by excavation, or by cutting or filling operations, or by root raking. Earthworks do not include: (a) cultivation of the soil for the establishment of crops or pasture, and (b) the harvesting of crops, and (c) thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and (d) the construction, repair, upgrade or maintenance of: (i) pipelines, and (ii) electricity lines and their support structures, including the National Grid, and (iii) telecommunication structures or lines, and (iv) radio communication structures, and (v) firebreaks or fence lines, and (vi) a bore or geotechnical investigation bore, and (e) repair or maintenance of existing roads and tracks, and airfield runways, taxiways, and parking aprons for aircraft, and (f) maintenance of orchards and shelterbelts, and (g) domestic gardening, and (h) repair, sealing or

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					resealing of a road, footpath, driveway, and (i) discharge of cleanfill material to a cleanfill area" Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.019	2 Interpretation	Existing wastewater discharge	Support	Supports the approach in clause (b) of the new text.	Retain as drafted, or ensure any changes to this definition keep it broad enough to include new (or newly identified) dry weather discharges from the existing wastewater network catchments, as well as wet weather discharge locations created as part of improvement works (e.g. new discharge points from attenuation tanks), or instances where an uncontrolled overflow point is replaced with a new constructed overflow point. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.020	2 Interpretation	High risk industrial or trade premise	Amend	Notes discharges from these premises are excluded from the local authority stormwater network rules (WH.R9 and P.R8) and seeks changed to better align with Wellington Water's areas of control.	Amend this definition or add a note to ensure it includes: 1) sites in relation to which the relevant stormwater discharge consents have not been granted and/or applied for, and 2) sites that have been used for the listed purposes in the past, and still generate contaminants in stormwater, but which are not currently used for any of those purposes Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.021	2 Interpretation	Hydrological control	Oppose	Opposes this definition and notes it will need to reflect the outcomes of the RPS process. Refers to comments made in Section A of submission..	Amend definition to ensure it is consistent with (or at least not inconsistent with) the RPS definition, and preserves flexibility for managing flows from small to large. Supports standards based on a specified depth of rainfall retention (e.g. retention of the first 5mm of rainfall depth). Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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S151.022	2 Interpretation	Impervious surfaces	Amend	Broadly supports the definition, but reserves position as to the detail as some technical changes required. For example, the use of "stormwater" here is not consistent with how that term is defined in the NRP and some other terms are used inconsistently. Concerned about how the exemptions for tanks and rainwater collection will impact the applicability of the stormwater rules.	Replace the reference to "stormwater" with 'rainfall', 'water', 'precipitation', or similar. Review and refine the list of exclusions in light of their implications for the rules. Refer to aggregate rather than metal. Remove duplicate references to 'porous or permeable paving'. Reconsider the reference to "reuse" which should be for 'non-potable purposes' to align with RPS language rather than 'grey water'. The final two bullet points have different approaches to permanent plumbing and use different terms for the same outcome (non-potable water use); this needs to be reconsidered also. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.023	2 Interpretation	Primary contact sites	Amend	Suggests that these would be better managed as part of Schedule H as it is disjointed to separate these from the coastal recreation sites.	Consider combining the primary contact sites with the Schedule H recreation sites.
S151.024	2 Interpretation	Redevelopment	Amend	Questions the way the examples are provided, particularly the use of 'etc', and requests that the re-roofing of existing buildings exception does not apply to zinc or copper. Considers breaking the chapeau into two sentences would make it easier to read.	Exclude zinc or copper roofs from the final exception clause Insert a full stop following the closing bracket, so that the new sentence starts: In relation to stormwater... Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.025	2 Interpretation	Stormwater catchment or sub-catchment	Amend	Considers the definition is confusing as it is not clear whether the definition includes (or should expressly include) areas where stormwater is discharged to land or groundwater or what 'in the same vicinity' means. Questions whether reference to maps would be more effective.	Revise the definition for clarity. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.026	2 Interpretation	Stormwater managem	Support	Broadly supports the definition, but suggests the new text specific to the two whaitua could be reframed as a note or explanation as it is not worded as part of the definition.	Retain as notified but consider adding new definitions for "Water quality and quantity outcomes". Other relief as may be required to address the issues

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		ent strategy		Considers it would be useful to define the phrase "water quality and quantity outcomes" to provide clarity	identified, including relief that is alternative, additional or consequential.
S151.027	2 Interpretation	Stormwater network	Support	Supports definition.	Retain as notified Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.028	2 Interpretation	Stormwater treatment system	Amend	Delete green infrastructure for clarity and refer to 'contamination in stormwater' rather than stormwater contaminants.	Delete reference to 'green infrastructure'. Refer to 'contamination in stormwater', rather than 'stormwater contaminants.' Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.029	2 Interpretation	Wastewater network catchment or sub-catchment	Support	Supports definition.	Retain as notified Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.030	2 Interpretation	Wet weather overflows	Amend	Generally supports definition, but considers the definition or the associated rules should distinguish between private and public networks.	Amend definition or associated rules to distinguish between private and public networks. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.031	3 Objectives	Objective O2	Oppose	Considers the benefits should be recognised regardless of the location	Retain the application of O2 in all locations. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.032	3 Objectives	Objective O5	Oppose	Considers this is important for source protection of drinking water.	Retain the application of O5 in all locations. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.033	3 Objectives	Objective O6	Oppose	Considers it is important that the social, economic, cultural and environmental benefits of taking and using water are recognised when managing water, and this position is not contrary to Te Mana o te Wai. Refers to comments in Section A of submission.	Retain the application of O6 in all locations and amend as follows: The social, economic, cultural and environmental benefits of: • taking and using water ~~are recognized~~ • **managing stormwater for the safety of people**

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					and property • **disposing of wastewater to achieve public health outcomes** **are recognized and provided for** when managing water. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.034	3 Objectives	Objective O18: Rivers, lakes, natural wetlands and coastal water are suitable for contact recreation and Māori customary use.	Neutral	Retain while further detail on Target Attribute States is developed	Retain application to all water bodies in all locations/whaitua Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.035	3 Objectives	Table 3.1 Primary contact recreation and Māori customary use objectives in freshwater bodies.	Neutral	Retain while further detail on Target Attribute States is developed	Retain application to all water bodies in all locations/whaitua Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.036	3 Objectives	Table 3.2 Secondary contact and Māori	Neutral	Retain while further detail on Target Attribute States is developed	Retain application to all water bodies in all locations/whaitua Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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		customary use recreation objectives in freshwater bodies.			
S151.037	3 Objectives	Table 3.3 Contact recreation and Māori customary use objectives in coastal water.	Neutral	Retain while further detail on Target Attribute States is developed	Retain application to all water bodies in all locations/whaitua Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.038	3 Objectives	Objective O19: Biodiversity, aquatic ecosystem health and mahinga kai in fresh water bodies and the coastal marine area are safeguarded.	Neutral	Retain while further detail on Target Attribute States is developed	Retain application to all water bodies in all locations/whaitua Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.039	3 Objectives	Table 3.4 Rivers and Streams.	Neutral	Retain while further detail on Target Attribute States is developed	Retain application to all water bodies in all locations/whaitua Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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S151.040	3 Objectives	Table 3.5 Lakes.	Neutral	Retain while further detail on Target Attribute States is developed	Retain application to all water bodies in all locations/whaitua Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.041	3 Objectives	Table 3.6 Groundwater.	Neutral	Retain while further detail on Target Attribute States is developed	Retain application to all water bodies in all locations/whaitua Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.042	3 Objectives	Table 3.7 Natural wetlands.	Neutral	Retain while further detail on Target Attribute States is developed	Retain application to all water bodies in all locations/whaitua Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.043	3 Objectives	Table 3.8 Coastal waters.	Neutral	Retain while further detail on Target Attribute States is developed	Retain application to all water bodies in all locations/whaitua Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.044	3 Objectives	Objective O25: Outstanding water bodies identified in Schedule A (outstanding water bodies) and their significant values are protected and restored.	Oppose	Opposes the note which disapplies Tables 3.4, 3.5, 3.6, and 3.8 from Whaitua Te Whanganui-a-tara and Te Awarua-o-Porirua.	Delete the note from Objective O25. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.045	3 Objectives	Objective O28: Ecosystems and	Oppose	Opposes the note which disapplies Tables 3.4, 3.5, 3.6, and 3.8 from Whaitua Te Whanganui-a-tara and Te Awarua-o-Porirua.	Delete the note from Objective O28. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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		habitats with significant indigenous biodiversity values are protected from the adverse effects of use and development, and where appropriate restored to a healthy functioning state including as defined by Tables 3.4, 3.5, 3.6, 3.7 and 3.8.			
S151.046	5.1 Air quality rules	Rule R35: Water and wastewater processes - permitted activity.	Amend	Question whether the reference to water processes should be more specific, such as 'drinking water processes	Consider referring to 'drinking water processes'. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.047	5.4 Beds of lakes and rivers	Beds of lakes and rivers	Amend	Supports the protection of native bird species habitat and the outcome general condition 5.4.4(n) seeks to achieve but is concerned the proposed amendment would require an ecologist to determine	Provide more certainty to plan users in general condition (n) so that a third party is not required to assess when named birds are identified as nesting, roosting and foraging, at the work site.

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		general conditions.		when the named birds are roosting, nesting, or foraging and this work would take significant time which has the potential for adverse effects on the environment while this work is underway. Considers there needs to be more certainty to plan users as to when works can occur, and when they cannot, and less reliance on a third party to confirm if a condition can be met.	Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.048	5.4 Beds of lakes and rivers	Rule R128: New structures - permitted activity.	Amend	Notes the inclusion of 'pipeline' removes 'pipes' from this Rule, as they have different dictionary definitions. Considers pipes have lesser effects than pipelines and should be specifically mentioned.	Amend to refer to both pipes and pipelines Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.049	5.4 Beds of lakes and rivers	Rule R151A: Ongoing diversion of a river - permitted activity.	Support	Supports the rule, specifically the approach that the ongoing diversion can only be considered permitted if all of the conditions of the resource consent to lawfully establish the diversion have been complied with.	Retain as notified. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.050	6 Other methods	Method M36: Freshwater Action Plan programme.	Amend	Refers to Section A of submission	Provide clarification about interaction between local authority networks and the SMS and the matters raised in Section A of the submission. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.051	6 Other methods	Method M38: Freshwater Action Plan for the Rangituhi catchment.	Amend	Refers to Section A of submission	Provide clarification about interaction between local authority networks and the SMS and the matters raised in Section A of the submission. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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S151.052	6 Other methods	Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	Refers to Section A of submission	Provide clarification about interaction between local authority networks and the SMS and the matters raised in Section A of the submission. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.053	6 Other methods	Method M43: Supporting the health of urban waterbodies.	Amend	Refers to Section A of submission. Supports the provision with amendments Notes the reference to Wellington Water Limited may not be appropriate in the future (or in all locations) and should be updated to ensure it remains relevant. Considers it inappropriate for the plan to include a method that commits other parties to 'incentivising' or 'research and development'. Considers a range of options should be provided for hydrological controls, not just tanks, and it would be helpful to confirm here the state of the environment monitoring and modelling that Greater Wellington will be undertaking.	Amend method as follows: Remove reference to Wellington Water Limited and replace with 'relevant water utility operator' or 'territorial authorities' or similar. Remove reference to incentivising and research and development by other parties. Provide further options than tanks for hydrological controls. Add confirmation that Greater Wellington will be undertaking all state of the environment monitoring and modelling. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.054	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater	Amend	Considers achieving wai ora by 2100 is a significant task. Considers It unclear what the status of the note is and as currently drafted it creates duplication, noting the third bullet point is replicated in WH.O4.	Alter timeframe to 2123. Clarify the status of the note. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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		bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.			
S151.055	8 Whaitua Te Whanganui-a-Tara	Objective WH.O2: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement	Amend	Seeks the timeframe be altered to 2060 as the 2040 timeframe will render prioritisation of sub-catchments for improvement or upgrade meaningless and 17 years is considered insufficient to achieve required outcomes. Supports the intent of measurable progress in clause (a). Considers clause (b) should have a maintenance component, rather than just improvement and there should be a comma after 'stability'. Considers clauses (f) and (g) need to be combined or better distinguished.	Alter timeframe to 2060. Retain clause (a) Amend clause (b): the hydrology of rivers and erosion processes, including bank stability, are **maintained and** improved **where degraded** and sources of sediment are reduced to a more natural level, and Combine or better distinguish clauses (f) and (g). Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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		towards wai ora.			
S151.056	8 Whaitua Te Whanganui-a-Tara	Objective WH.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved to achieve the coastal water objectives set out in Table 8.1.	Oppose	Seeks the timeframe be altered to 2060 as the 2040 timeframe will render prioritisation of sub-catchments for improvement or upgrade meaningless and 17 years is considered insufficient to achieve required outcomes. Considers the CWO contained in Table 8.1 are generally appropriate parameters for coastal environmental health, but notes the lack of information relating to baseline states for Coastal Water Management Units and timeframes to meet the requirements makes it difficult to determine whether improvement can be measured (refer also Section A of submission). In clause (b) 'high contaminant concentrations' should be better defined to clarify the work involved and when this clause is relevant. Considers where improvement is required for the Coastal Water Objectives, the requirement should be that the Objective has been achieved or meaningful progress has been made - similar to clause WH.O2(a). Considers clauses (g) and (h) need to be combined or better distinguished.	Provide further detail in relation to the baseline states and required timeframes in both this objective and Table 8.1. Provide maps showing locations of high contaminant concentrations. Amend objective to provide this further detail. In addition to the above, amend as follows: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained, ~~or improved~~ **or meaningful progress has been made towards improvement** to achieve the coastal water objectives set out in Table 8.1, and by ~~2040~~ **2060.** Define 'high contaminant concentrations' in clause (b) Combine or better distinguish clauses (g) and (h) Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.057	8 Whaitua Te Whanganui-a-Tara	Table 8.1 Coastal water objectives.	Oppose	Considers Table 8.1 lacks the required information to set baseline states for the Coastal Water Management Units to assess whether the state is being maintained or improved, and lacks timeframes for when the baseline will be determined.	Alter timeframe to 2060 and Withdraw table until further detail in relation to the baseline states and required timeframes can be added. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.058	8 Whaitua Te Whanganui-a-Tara	Objective WH.O8: Primary contact sites within Te Awa	Amend	Seeks the timeframe be altered to 2060 as the 2040 timeframe will render prioritisation of sub-catchments for improvement or upgrade meaningless and 17 years is considered insufficient to achieve required outcomes.	Alter timeframe to 2060 Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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		Kairangi/Hutt River, Pākuratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact.			
S151.059	8 Whaitua Te Whanganui-a-Tara	Objective WH.O9: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Amend	Refers to Section A of submission for additional context regarding prioritisation and target attribute states, and comments on Table 8.4. Considers Clause (a) needs to refer to 'meaningful progress' as specified by WH.02(a). Considers Clause (d) Huanga needs to refer to Schedule B to provide certainty for applicants and notes there appears to be a typo .	Revise clause (a) as follows: 'where a target attribute state in Table 8.4 is not met, the state of that attribute is improved in all rivers and river reaches in the part Freshwater Management Unit so that the target attribute state is met within the timeframe indicated within Table 8.4, **or meaningful progress has been made** and' Link huanga with Schedule B and improve wording. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.060	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Oppose	Refers to Section A of submission. Notes a lack of information relating to the baseline state to measure against, meaning it is not possible to determine whether the TAS parameters and requirements are reasonable, appropriate and achievable. Considers the 2040 timeframe will result in the requirement for a large proportion of sub-catchments (or possibly all of them) to be upgraded in the short term, rendering prioritisation of sub-catchment upgrades meaningless.	Provide further information on the baseline state and a detailed assessment of the implications of the TAS provisions on a sub-catchment basis. Alter timeframe to 2060. Include guidance on how to measure the proportion from WWL's networks with inputs from other sources within the catchment. Withdraw the table until the further detail can be added. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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				Refers to comments in relation to specific parameters within Table 8.4.	
S151.061	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Oppose	Periphyton Biomass 1) Notes Periphyton biomass is dependent on a range of environmental and human factors including shading, nutrient concentrations and sedimentation rates. Tackling these factors will require a process to identify the relevant factors and required actions further than those under WWL's control. 2) Notes certain sites have a lack of data for the setting of baselines and there is uncertainty whether achieving the TAS by 2040 is realistic and achievable. 3) Notes that natural conditions and land uses and activities within the catchment may prevent a TAS being achieved, including shading, stream bed type and channelisation.	Provide further information on the baseline state, and a detailed assessment of the implications of the TAS provisions on a sub-catchment basis. Withdraw the table until the further detail can be added. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.062	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Oppose	E coli Notes there will be other forms of faecal bacteria contamination within catchments, eg. rural inputs (managed through P.P20 & P.P24), on-site wastewater treatment and from birds or dogs. Recognise that WWL's assets will not be the only factor which determines if the TAS is met.	Include guidance on how to measure the proportion from WWL's networks relative to inputs from other sources within the catchment. Provide further analysis to determine whether improvements are achievable. Withdraw the table until the further detail can be added. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.063	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Oppose	Fish/Fish Community Health 1) Notes the abundance and type of fish species is dependent on a range of environmental and human factors and tackling these factors requires a process to identify the relevant factors and required actions further than those under WWL's control. 2) Considers at all sites there is a lack of data for the setting of baselines and the required improvements may be unrealistic for these sites by	Provide further information on the baseline state, and a detailed assessment of the implications of the TAS provisions on a sub-catchment basis. Withdraw the table until the further detail can be added. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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				2040 3) Notes that natural conditions and land uses and activities within the catchment may prevent a TAS being achieved, including through invasive species, the temperature of watercourses, channelization and barriers to fish passage. 4) Once any required improvements have been made to a catchment it can take a period of time for this to be observed in an improvement in fish abundance and diversity (Membane (2022)).	
S151.064	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Oppose	Macroinvertebrates 1) Notes the abundance and diversity of macroinvertebrate species is dependent on a range of environmental and human factors and that tackling these factors will require a process to identify the relevant factors and required actions further than those under WWL's control. 2) Notes that at some sites there is a lack of data for the setting of baselines and the required improvements may be unrealistic for these sites by 2040. 3) Notes that natural conditions and human land uses and activities within the catchment may prevent a TAS being achieved and this could include through invasive species, the temperature of watercourses, channelization and lack of habitat. 4) Once any required improvements have been made to a catchment it can take a period of time for this to be observed in an improvement in macroinvertebrate abundance and diversity (Collier et al., 2002)	Provide further information on the baseline state and a detailed assessment of the implications of the TAS provisions on a sub-catchment basis. Any other changes necessary to satisfactorily address the issues raised. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.065	8 Whaitua Te	Table 8.4: Target	Oppose	Suspended fine sediment/deposited fine sediment There is uncertainty regarding the modelled	Consider all contributing sediment sources for setting TAS for visual clarity and deposited sediment and address:

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	Whanganui-a-Tara	attribute states for rivers.		correlation between sediment loads and visual clarity. SedNet is a national scale model which has had to be adjusted to the scale of the target TAS locations. This increased granularity may lead to higher levels of uncertainty. Furthermore, sediment loads, visual clarity and deposited sediment are influenced by factors within catchments outside of WWL's control including human land uses and activities and natural factors.	1. How sediment load reductions will be measured in the future 2. How would proportionate contribution to sediment be measured and any reduction in this contribution be measured Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.066	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Oppose	Dissolved oxygen mg/L (below point sources only) Considers there is a lack of data for the setting of baselines and the required improvements may be unrealistic for these sites by 2040	Provide guidance on when baseline states will be set and mitigation provided should the set TAS be shown to be unrealistic when a baseline is determined. Withdraw the table until the further detail can be added. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.067	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Oppose	Dissolved organic nitrogen/dissolved reactive phosphorus Considers the assessment of the implications of the TAS requires input from a wide variety of stakeholders and additional assessment.	Withdraw the table until the further detail can be added. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.068	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Oppose	Dissolved copper/dissolved zinc Considers the approach of Policy P.P9 does not recognise the other sources of zinc and copper outside of WWL's control (e.g. zinc roofs, copper based brake disks). Considers the required changes will require an approach outside of WWL's control that will take years and significant investment to enact, and may not have occurred by 2040. Notes the TAS is for dissolved copper and dissolved zinc can be more challenging to remove through stormwater treatment devices than total copper and total zinc.	Amend Policy P.P9 and update table to reflect this. Withdraw the table until the further detail can be added. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.069	8 Whaitua Te	Table 8.4: Target attribute	Oppose	Ecosystem metabolism Table 8.4 notes that further monitoring is needed to	Provide further information on how the Ecosystem metabolism will be monitored and a baseline set is required. Withdraw the table until the further detail can be added.

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	Whangan ui-a-Tara	states for rivers.		define the baseline state and develop the attribute state framework	Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.070	8 Whaitua Te Whangan ui-a-Tara	Table 8.4: Target attribute states for rivers.	Oppose	Ammonia (toxicity) Notes that external factors, such as activities and land use in the catchments may lead to failure of TAS outside of WWL's control.	Include guidance on how to measure the proportion from WWL's networks with inputs from other sources within the catchment. Withdraw the table until the further detail can be added. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.071	8 Whaitua Te Whangan ui-a-Tara	Table 8.4: Target attribute states for rivers.	Oppose	Nitrate (toxicity) Notes that external factors, such as activities and land use in the catchments may lead to failure of TAS outside of WWL's control.	Include guidance on how to measure the proportion from WWL's networks with inputs from other sources within the catchment. Withdraw the table until the further detail can be added. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.072	8 Whaitua Te Whangan ui-a-Tara	Policy WH.P1: Improvem ent of aquatic ecosystem health.	Amend	Supports the reference in clause (a) to 'progressively reducing the load' as reflecting the volume of work that needs to be achieved. Notes that under clause (c) not all locations will require enhancement. Seeks that for clause (d), 'work programmes' is defined or a more specific term used to clarify that it does not relate to local authority networks.	Retain clause (a) Replace 'enhancing' with 'maintaining or improving' in clause (c) Define or use a more specific term for 'work programmes' in clause (d) Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.073	8 Whaitua Te Whangan ui-a-Tara	Policy WH.P2 Managem ent of activities to achieve target attribute states and coastal water objectives.	Amend	Refers to Section A of submission. Notes there is a lack of information relating to the baseline state to measure against so it is not possible to determine whether the TAS and CWO parameters and requirements are reasonable, appropriate and achievable. Considers it unclear how the TAS, CWO and Freshwater Action Plans will impact upon sub-catchment prioritisation of improvements required for stormwater and wastewater discharges. Considers clause (b) is too vague and should clearly state that redevelopment in existing urban	Clarify how the FAP provisions will work alongside existing TAS provisions, network discharge consent provisions, and in particular Schedules 31 and 32. Provide clarity over relationship between' non-regulatory methods' and 'work programmes'. Amend policy to the extent necessary to appropriately reflect these interrelationships. Amend provision as follows: ~~(b)~~encouraging **and where appropriate, requiring that** redevelopment activities within existing urban areas ~~to~~ **shall** reduce the existing urban contaminant load, and ~~(c)~~ imposing hydrological controls on: (i) urban development and

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				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. Considers clause (c) should make allowance for stormwater discharges that are not creating streambank erosion.	(ii) **where appropriate and practicable,** stormwater discharges to rivers **in relation to streambank erosion** Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.074	8 Whaitua Te Whanganui-a-Tara	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Amend	Refers to Section A of submission. Considers it unclear how FAPs are intended to operate alongside other provisions within the plan change, Wellington Water stormwater and wastewater network discharge consents, and in general Wellington Water's network operations. Notes that the current provisions for FAPs, although a non-regulatory 'other method', could be read to have some level of influence in relation to wastewater and stormwater network discharge consents and prioritisation of sub-catchments. Considers that there should be no relationship between the contents of an FAP and the scheduled requirements for network discharge consents.	Clarify how the FAP provisions will work alongside existing TAS provisions, network discharge consent provisions, and in particular Schedules 31 and 32. Amend policy to the extent necessary to appropriately reflect these interrelationships. Clarify what is intended for the level of consideration or influence that any FAP could have on wastewater and stormwater network discharge consents. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.075	8 Whaitua Te Whanganui-a-Tara	Policy WH.P4: Achievement of the visual clarity target attribute states.	Amend	Refers to Section A of submission and submission points on Table 8.5. Considers a detailed assessment of the implications of the TAS provisions is required on a sub-catchment basis to determine appropriateness of the requirements and 2040 timeframes, and implications for sub-catchment prioritisation.	Amendments to address the issues identified in Section A and submission points in relation to Table 8.5. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.076	8 Whaitua Te Whanganui-a-Tara	Table 8.5: Sediment load reductions required to achieve the visual clarity	Amend	Refers to Section A of submission. Considers a detailed assessment of the implications of the TAS provisions is required on a sub-catchment basis to determine appropriateness of the requirements and 2040 timeframes, and implications for sub-catchment prioritisation. Considers further assessment is needed to address uncertainty regarding the modelled correlation	Refer to Section A overarching submission points. Amend timeframe to 2060 Set TAS for visual clarity and deposited sediment by taking into consideration all contributing sediment sources, and address the following points: 1. How sediment load reductions will be measured in the future

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		target attribute states.		between sediment loads and visual clarity. Notes that SedNet is a national scale model which has had to be adjusted to the scale of the target TAS locations and this may lead to higher levels of uncertainty. Notes that sediment loads, visual clarity and deposited sediment are influenced by factors within catchments outside of WWL's control including human land uses and natural factors.	2. How would proportionate contribution to sediment be measured and any reduction in this contribution be measured Withdraw the table until the further detail can be added. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.077	8 Whaitua Te Whanganui-a-Tara	Policy WH.P6: Cumulative adverse effects of point source discharges.	Amend	The exclusion of stormwater and wastewater needs to be very explicit.	Amend policy as follows: ~~The cumulative adverse effects of~~ **For** point source discharges **to water,** ~~excluding~~ **other than** stormwater network and wastewater discharges, ~~to water~~ **cumulative adverse effects** are avoided and: OR in the alternative, define "point source discharge" to clearly exclude discharges from wastewater and stormwater networks Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.078	8 Whaitua Te Whanganui-a-Tara	Policy WH.P8: Avoiding discharges of specific products and waste.	Amend	Supports the intent of this policy and associated rule but concerned about how it may impact on stormwater and wastewater discharges.	Amend policy as follows:**...** **Noting that this policy does not apply to contaminants collected as part of stormwater management in response to precipitation or part of the operation of the wastewater network.** Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.079	8 Whaitua Te Whanganui-a-Tara	Policy WH.P9: General stormwater policy to achieve the target attribute states and	Amend	Considers baseline states cannot be maintained if they are not clear. Considers the reference to table 8.1 should be deleted because it contains no relevant information. Notes the policy could be interpreted as stormwater discharges being the only cause of heavy metal targets not being met, which is not correct.	Amend policy as follows: Stormwater discharges to a surface water body or coastal water, or into or onto land in a manner that may enter freshwater or coastal water, are managed **to support, in a commensurate manner,** ~~so that~~ the baseline water quality state for copper and zinc ~~is~~ **being** maintained, or improved where degraded, including in the relevant part Freshwater Management ~~Unit or coastal water management unit,~~ in order for the ~~coastal water objectives and~~ target attribute

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		coastal water objectives.		The timeframes in Table 8.4 should refer to 2060 rather than 2040.	states to be met by the timeframes set out in ~~Tables 8.1 and~~ 8.4. Define "commensurate" as set out in definitions submission point (refer Section A of submission). Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.080	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	Amend	Notes that for clause (a), 'maximise' already has a practicability component to it in the definitions.	Amend policy as follows: (a) using source control to minimise contaminants in the stormwater discharge and maximise, ~~to the extent practicable,~~ the removal of contaminants from stormwater, including through the use of water sensitive urban design measures, and Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.081	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Support	Supports this provision as achieving positive outcomes for water quality.	Retain as notified
S151.082	8 Whaitua Te Whanganui-a-Tara	Policy WH.P13: Managing stormwater network discharges through a Stormwate	Amend	Refers to overarching Section A of submission, particularly in relation to prioritisation, TAS, modelling and monitoring. Supports the focus on copper and zinc in clause (a) Considers the reference to concentrations in clause (b) should be deleted.	Amend policy as follows: Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy ~~Stormwater discharges from local authority and state highway networks shall be managed by:~~ ~~(a) reducing the copper and zinc loads in discharges to coastal water management units to contribute to meeting the~~

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		r Management Strategy.		Considers the range of target attribute states in clause (c) is too wide and creates uncertainty. Considers clause (e) should focus on modelling to determine the necessary copper and zinc load reduction in stormwater discharges Opposes the stormwater network modelling component of clause (e), noting WWL will not model the network in its entirety ahead of starting work on subcatchments. Seeks the deletion of reference to concentrations. States there is no point running a CLM model after implementation because it will provide the same information as pre-implementation. Opposes the requirement in (e) to monitor concentrations in network discharge as concentrations are more relevant for receiving waters and loads are more appropriate for network discharges. Considers it unclear how the prioritisation component of (e) will align with clause (f). Considers the prioritisation in Clause (f) is meaningless and it is unclear how clauses (e) and (f) would interact. Notes the plan uses different terms that mean the same thing and it is unclear whether these terms are intended to be applied in the same way, for example, in this policy: (i) 'Contribute to' (ii) 'Supporting the achievement of' Considers the policy should be specific regarding	~~coastal water objectives to maintain or improve, and~~ ~~(b) reducing the concentration and contaminant loads of copper and zinc from discharges to surface water bodies in order to maintain, and in degraded part Freshwater Management Units improve, the water quality state for dissolved copper and zinc to contribute to meeting the target attribute states in those part Freshwater Management Units, and~~ ~~(c) supporting the achievement of any other relevant target attribute states or coastal water objectives including for ecosystem health, nutrients, visual clarity and Escherichia coli or enterococci, and~~ ~~(d) implementing a stormwater management strategy and stormwater management plans prepared in accordance with the information and requirements set out in Schedule 31 (stormwater strategy – whaitua), and~~ ~~(e) monitoring and modelling the stormwater network to identify catchments to be prioritised, the copper and zinc concentrations and loads in the discharge, and changes in discharge volume and quality over time following improvements in the network infrastructure, and~~ ~~(f) prioritising the reduction, removal, and/or treatment of stormwater discharges to Schedule A (outstanding water bodies) or Schedule C (mana whenua) sites, or mahinga kai.~~ **Stormwater discharges from local authority and state highway networks shall be managed by:** **(a) reducing the copper and zinc loads in discharges to coastal water management units to contribute to meeting the coastal water objectives to maintain or improve, and** **(b) reducing the contaminant loads of copper and zinc from discharges to surface water bodies in order to maintain, and in degraded part Freshwater Management Units improve, the water quality state for dissolved copper and zinc to contribute to meeting the target attribute states in those part Freshwater Management Units, and** **(c) supporting the achievement of relevant target attribute states or coastal water objectives for nutrients**

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				which Target Attribute States need to be addressed by the SMS and so seeks clause (c) be deleted.	**and E. coli or enterococci, and** **(d) implementing a stormwater management strategy and stormwater management plans prepared in accordance with the information and requirements set out in Schedule 31 (stormwater strategy - whaitua), and** **(e) modelling the copper and zinc loads in the discharge, and** **(f) in order to implement the objectives and policies of the Regional Plan, prioritising the improvement of discharges in stormwater sub-catchments using a methodology to be set out in a Stormwater Management Strategy prepared in accordance with Schedule 31, that will include engagement with mana whenua and take into account:** **i. Schedule A (outstanding water bodies)** **ii. Schedule C (sites with significant mana whenua values)** **iii. Schedule F (Ecosystems and habitats with significant indigenous biodiversity)** **iv. Schedule H (contact recreation and Māori customary use)** **v. Map 85 (Primary contact sites - Te Whanganui-a-tara)** **vi. impacts on group drinking water supplies or community drinking water supplies** **vii. efficiency and alignment with other work programmes, including work in accordance with a wastewater network catchment improvement strategy or sub-catchment improvement plan;** **viii. investment availability** **ix. public health effects** **x. modelling results** **xi. effects on the environment.** Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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S151.083	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Supports the intent of this policy, but is unsure if a mean annual runoff target is the most appropriate measure. Queries whether this should be mean rather than median, and how easy this will be for developers or Wellington Water to assess compliance. Considers ready made 'acceptable solutions' may be easier to implement.	Review policy, in particular the reference to mean annual runoff, to ensure that the policy imposes targets that are readily measurable, able to be easily implemented, and clearly relate to the effects of runoff on the environment. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.084	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Support	Supports this provision as achieving freshwater quality outcomes	Not stated
S151.085	8 Whaitua Te Whanganui-a-Tara	Policy WH.P17: General wastewater policy to achieve target attribute states and coastal objectives.	Oppose	Refers to Section A of submission and submission points on Tables 8.1 and 8.4. Notes the policy could be interpreted as wastewater discharges being the only cause of E.Coli targets not being met, which is not correct.	Provide further information on the baseline state, and a detailed assessment of the implications of the TAS provisions on a sub-catchment basis. Include guidance on how to measure the proportion from WWL's networks with inputs from other sources within the catchment. In addition to the further information requested above and incorporation of this information into the provisions, revise the policy to reflect the proportionate effect of discharges, as follows: Wastewater discharges to a surface water body or coastal water, or into or onto land in a manner that may enter freshwater or coastal water are managed **to support, in a commensurate manner,** ~~so that~~ the baseline water quality

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					state for Escherichia coli or enterococci is **being** maintained, or improved where degraded, including in the relevant part Freshwater Management Unit or coastal water management unit, in order for the target attribute states and coastal water objectives to be met by the timeframes set out in Tables 8.1 and 8.4. "Commensurate" as referred to in Wellington Water's proposed provision changes is defined as follows: Commensurate: In the context of reductions in contaminants in wastewater or stormwater discharges, means a level of reduction that is both proportionate to the effect of the discharge on the receiving environment, and reasonably within the control of the applicant. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.086	8 Whaitua Te Whanganui-a-Tara	Policy WH.P18: Progressing works to meet Escherichia coli target attribute states.	Oppose	Considers the purpose of policy is unclear and it implies that wastewater networks are the only source of e coli. Refers to comments on prioritisation in Section A of submission.	Delete Policy Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.087	8 Whaitua Te Whanganui-a-Tara	Policy WH.P19: Managing wastewater network catchment discharges.	Amend	Refers to Section A overarching submission points on modelling and prioritisation. Considers the policy should only relate to discharges within the public network and privately owned wastewater pipes should not be included. Considers frequency is a more appropriate metric than volume for wastewater overflows in the network in clauses (a), (c), (g) and (h). Considers it unclear in clause (a) whether wet	Remove references to monitoring and modelling in this context. Amend provisions as follows: Policy WH.P19: Managing wastewater network catchment discharges ~~All wastewater network catchment discharges, including those which discharge via a stormwater network, shall be managed by:~~

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				weather overflows are related to target attribute states and coastal water objectives. Notes policies WH.P19 and P.P18 direct that wet weather overflows are reduced to meet or exceed the containment standard but other provisions (e.g. Schedule 32) suggest that wet weather overflows are relevant to target attribute states and coastal water objectives. Supports the focus on containment standard. Considers prioritisation in clause (b) as meaningless and it is not clear how this would work with clause (h). Considers the reference to 'potential' discharges in Clause (c) is unclear and so should be deleted. Considers clause (e): should also mention kaitiaki monitoring. Supports the intent of Clause (f) but is concerned it is not practicable. Notes that for clause (h) Wellington Water is not able to model E. coli or enterococci concentrations or load in network overflows, and instead must use the frequency as a proxy for this.	~~progressively reducing the frequency and/or volume of wet weather overflow events to meet or exceed the containment standard of no more than 2 per year through the implementation of the methodologies set out in a Wastewater Network Catchment Improvement Strategy prepared in accordance with Schedule 32 (wastewater strategy), and~~ ~~(a) prioritising the removal of wet weather overflows in wastewater network sub-catchments where wet weather overflows are discharging to Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule H (contact recreation and Māori customary use) sites, and primary contact sites in Map 85, and mahinga kai, or where they may affect group drinking water supplies and community drinking water supplies, and~~ ~~(b) progressively reducing the frequency and/or volume of dry weather discharges or the potential for these discharges through the implementation of a Wastewater Network Catchment Improvement Strategy prepared in accordance with Schedule 32 (wastewater strategy) to contribute to meeting the target attribute states for Escherichia coli in Table 8.4 and the coastal water objectives for enterococci in Table 8.1, and~~ ~~(c) implementing an inflow and infiltration programme to proactively upgrade the pipe network to progressively reduce stormwater and groundwater infiltration and inflow into the wastewater network catchment, and~~ ~~(d) engaging with mana whenua on their values and interests in relation to discharges and receiving waters, including adverse effects on Māori customary use and mahinga kai, and~~

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					~~(e) avoiding wastewater network catchment discharges entering private property or educational facilities, and~~ ~~(f) avoiding increasing the frequency and/or volume of wastewater network catchment discharges as a result of climate change, or new urban development and intensification, and~~ ~~(h) monitoring and modelling the wastewater network catchment to identify catchments to be prioritised, the Escherichia coli or enterococci concentration in the discharge, and changes in discharge frequency, volume and quality over time following improvements in the network infrastructure.~~ **All existing wastewater discharges from a local authority wastewater network catchment including those which discharge via a stormwater network, shall be managed by:** **(a) progressively reducing the frequency of wet weather overflow events to meet or exceed the containment standard of no more than 2 per year through the implementation of the methodologies set out in a wastewater network catchment improvement strategy prepared in accordance with Schedule 32 (wastewater strategy), and** **(b) reducing the frequency of dry weather discharges over time, in accordance with a responsive management approach to be detailed in the wastewater network catchment improvement strategy, and** **(c) in order to implement the objectives and policies of the Regional Plan, prioritising the reduction of wet weather overflows in wastewater network sub-catchments using a methodology to be set out in the wastewater network catchment improvement strategy prepared in accordance with Schedule 32 (wastewater strategy), that will include engagement with mana**

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					whenua and take into account the following: i. Schedule A (outstanding water bodies) ii. Schedule C (sites with significant mana whenua values) iii. Schedule H (contact recreation and Māori customary use) iv. Map 85 (Primary contact sites - Te Whanganui-a-tara) v. impacts on group drinking water supplies or community drinking water supplies vi. efficiency and alignment with other work programmes including stormwater improvement works under a stormwater management strategy or stormwater management plan vii. investment availability viii. public health effects ix. modelling results x. environmental effects (d) implementing an inflow and infiltration programme to proactively upgrade the pipe network to progressively reduce stormwater and groundwater infiltration and inflow into the wastewater network catchment, and (e) engaging with mana whenua on their values and interests in relation to discharges and receiving waters, including adverse effects on Māori customary use and mahinga kai, and on-going opportunities for kaitiaki monitoring provided by mana whenua, and (f) avoiding, where practicable, wastewater network catchment discharges entering private property or educational facilities, or where it is not practicable to avoid them, implementing a methodology for resolution, and (g) avoiding increasing the frequency of

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					wastewater network catchment discharges as a result of climate change, or new urban development and intensification, and **(h) monitoring and/or modelling the wastewater network to understand changes in discharge frequency over time following improvements in the network infrastructure.** Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.088	8 Whaitua Te Whanganui-a-Tara	Policy WH.P20: Managing existing wastewater treatment plant discharges.	Amend	Considers the policy will disincentivise long outfalls as there is no recognition of the benefits of pollution dispersal, the receiving environment (depth and turbulence) and ecology. A more lenient approach to Coastal environments should be applied as they are not subject to bottom lines and limits pursuant to the NPS-FM. Notes all Wellington Water's wastewater activities seem to be subject to improvement, regardless of whether the improvement is warranted or not, and considers a more focused approach would be beneficial as their WWTP discharges to marine environments have limited impact on the environment and should be enabled. Seeks clause (a) be amended so the requirement to maintain the entercocci load for coastal water is altered to: continue to meet the coastal water objective. For Clause (f), questions why mahinga kai needs to be monitored within the zone of reasonable mixing and suggests it should only be at the outer extent. Suggests the directiveness of the 'Note' is unusual and it would work better as part of clause (c).	Delete and replace with policy that: • Recognises the benefits of WWTPs and their limited impacts on the environment • Recognises the differences between coastal and freshwater environments • Enables consideration of the benefits of dispersal, environmental effects and receiving environment rather than just treating all discharges the same • Maintains clause (c) and builds in kaitiaki monitoring, rather than relying on a note • Remove the requirement for mahinga kai monitoring in the zone of reasonable mixing Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.089	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down	Amend	Considers this excessive given the scale of work that needs to be delivered for Te Mana o te Wai and an exemption is required for Regionally Significant Infrastructure	Amend to provide an exemption for Regionally Significant Infrastructure. Other relief as may be required to address the issues

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		of earthworks.			identified, including relief that is alternative, additional or consequential.
S151.090	8 Whaitua Te Whanganui-a-Tara	Rule WH.R1: Point source discharges of specific contaminants - prohibited activity.	Amend	Supports the intent of this rule and associated policy but concerned about how it may impact on stormwater and wastewater discharges.	Add new clause to the end of the existing rule as follows:**... Noting that this rule does not apply to the discharge of contaminants collected as part of stormwater management as a result of precipitation or part of the operation of the wastewater network.** OR as alternative relief, define "point source discharge" so as to exclude discharges from the stormwater wastewater networks Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.091	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Support	Supports this approach	Not stated
S151.092	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Amend	Concerned that (f) and (g) should not be occurring even if they are via the stormwater network and that it is the landowners responsibility to resolve.	Amend Rule as follows: ...~~and where the discharge is not via an existing local authority stormwater network the discharge shall also not:~~ Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.093	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redevelop	Amend	Considers clause (c) is too vague as it does not specify what the hydrological controls have to achieve, and that compliance with a rainfall depth is required Concerned that (f) and (g) should not be occurring	Amend Rule WH.R5 to provide greater specificity in clause (c), including a requirement to retain a specific depth of rainfall. Delete the following clause: ~~and where the discharge is not via an existing local authority stormwater network the~~

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		ed impervious surfaces - permitted activity.		even if they are via the stormwater network and that it is the landowners responsibility to resolve.	~~discharge shall also not:~~ Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.094	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Questions if clause (e) is missing a word after 'mean annual runoff' such as 'volume' or 'load'	Consider if clause (e) requires an extra word. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.095	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Support	Not stated	Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.096	8 Whaitua Te Whanganui-a-Tara	Rule WH.R9: Stormwater from a local authority or state highway network-restricted	Amend	Considers the rule extremely hard to satisfy and applications will become non-complying activities with avoid policies in place. Suggests R93 should be added to the list of provision that will no longer apply to Whaitua Te Whanganui-a-Tara or Te Awarua-o-Porirua Whaitua and the matters of discretion need to avoid duplication with Schedule 32.	Provisions to be revised as follows: ~~Rule WH.R9: Stormwater from a local authority or state highway network-restricted discretionary activity~~ ~~The discharge of stormwater into water, or onto or into land where it may enter water, from a local authority or state highway stormwater network, including discharges via another stormwater network, except those from a high risk industrial or trade premise, or ports and airports, is a restricted discretionary activity, provided the resource consent application includes a stormwater management~~

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		discretionary activity.		Considers that the matters of discretion are uncertain, 'in accordance with' is not a matter of fact. Considers there is duplication between clauses (1) and (2)-(9) and many of these clauses are unclear. Refers to Section A of submission for additional context regarding prioritisation, target attribute states, modelling and monitoring.	~~strategy prepared in accordance with Schedule 31 (stormwater strategy - whaitua) to progressively improve discharge quality, including a reduction of copper and zinc commensurate with what is required in the receiving environment to meet the target attribute state in Tables 8.4 or coastal water objective in Table 8.1 for the relevant part Freshwater Management Unit or coastal water management unit.~~ ~~Matters for discretion~~ ~~1. The contents and implementation of a stormwater management strategy prepared in accordance with Schedule 31 (stormwater strategy - whaitua)~~ ~~2. The reduction of copper and zinc where required in order for the target attribute state or coastal water objective for these attributes to be met~~ ~~3. Measures to achieve any other relevant target attribute states or coastal water objectives including for ecosystem health, nutrients, visual clarity and Escherichia coli or enterococci~~ ~~4. Adverse effects, including cumulative and localised adverse effects, on:~~ ~~(i) groundwater, surface water and coastal water, and particularly sites identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori customary use), and~~ ~~(ii) group drinking water supplies and community drinking water supplies~~ ~~5. Methodology to prioritise the reduction, removal, and/or treatment of stormwater discharges, including information requirements and engagement with mana whenua and the community~~ ~~6. The use of hydrological control and water sensitive urban design measures to mitigate adverse effects of stormwater discharges, provide communal stormwater treatment, or offset discharges arising from new greenfield development~~ ~~7. The programme and timeframes for implementing~~

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					~~measures and/or capital works~~ ~~8. Monitoring and modelling of the stormwater network~~ ~~Notification~~ ~~In respect of Rule WH.R9, applications are precluded from public notification (unless special circumstances exist).~~ ~~Relevant iwi authorities shall be determined to be an affected party to an application under this rule.~~ ~~Note~~ ~~For the discharge of stormwater from an existing high risk industrial or trade premise, or the discharge of stormwater from a port or airport refer to Rules WH.R4 and WH.R8 respectively. Other existing discharges of stormwater into a local authority stormwater network will be managed under this rule by the local authority or the relevant water authority.~~ **The discharge of stormwater into water, or onto or into land including where it may enter water, from a local authority or state highway stormwater network, including discharges via another stormwater network, except those from a high risk industrial or trade premise, is a restricted discretionary activity, provided the resource consent application includes a stormwater management strategy that:** **a. Sets out a framework for management of the stormwater network over time to improve the adverse acute, chronic and cumulative effects of stormwater discharges on surface water bodies, groundwater and coastal water,** **b. Identifies catchment characteristics,** **c. Includes strategic actions and management options to:** **i. reduce copper and zinc loads, and** **ii. make progress towards relevant target attribute states for nutrients and E. coli or enterococci, and** **iii. reduce stream bank erosion, and** **d. Addresses localised effects.** **Matters for discretion** **1. The contents and implementation of a stormwater management strategy prepared in accordance with Schedule 31 (stormwater strategy -**

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					whaitua) **2. The methodology for reducing copper and zinc where required in order to contribute to meeting the target attribute state or coastal water objective for these attributes** **3. Measures to contribute to meeting target attribute states or coastal water objectives for nutrients and E. coli or enterococci** **4. Adverse effects, including cumulative and localised adverse effects, on:** **(i) groundwater, surface water and coastal water, and particularly sites identified in Schedule A (outstanding water bodies), Schedule C (sites with significant mana whenua values), Schedule F (ecosystems and habitats with significant indigenous biodiversity), Schedule H (contact recreation and Māori customary use), and** **(ii) group drinking water supplies and community drinking water supplies** **5. Methods to address streambank erosion** **Notification** **In respect of Rule WH.R9, applications are precluded from public notification (unless special circumstances exist). Relevant iwi authorities shall be determined to be an affected party to an application under this rule.** **Note** **In respect of the discharge from an existing high risk industrial or trade premise, or the discharge of stormwater from a port or airport refer to Rules WH.R4 and WH.R8 respectively. Other existing discharges of stormwater into a local authority stormwater network will be managed under this rule by the local authority or the relevant water authority.** Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.097	8 Whaitua Te	Rule WH.R14:	Amend	Considers the rule extremely hard to satisfy and applications will become non-complying activities	Amend provision as follows:

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	Whanganui-a-Tara	Wastewater network catchment discharges - restricted discretionary activity.		with avoid policies in place. Refer activity status points in Section A. Considers R93 should be added to the list of provision that will no longer apply to Whaitua Te Whanganui-a-Tara or Te Awarua-o-Porirua Whaitua and the matters of discretion need to avoid duplication with Schedule 32. Considers the matters of discretion are uncertain, 'in accordance with' is not a matter of fact. Considers there is duplication between clauses (1) and (2)-(9) and many of these clauses are unclear. Refers to Section A of submission for additional context regarding prioritisation, target attribute states, modelling and monitoring.	Rule WH.R14: Wastewater network catchment discharges - restricted discretionary activity ~~The existing wastewater discharge from a wastewater network catchment including via a stormwater network to a surface water body or coastal water or onto or into land where it may enter water, is a restricted discretionary activity provided the resource consent application includes a strategy to progressively reduce and remove wastewater network catchment discharges in relation to the consent sought, in accordance with the requirements of Schedule 32 (wastewater strategy), including a strategy to progress towards reducing reduction of Escherichia coli or enterococci commensurate with what is required in the receiving environment to work towards achieving meet the target attribute state in Table 8.4 or coastal water objective in Table 8.1 for the relevant part Freshwater Management Unit or coastal water management unit.~~ ~~Matters for discretion~~ ~~1. The contents and implementation of a wastewater network catchment improvement strategy prepared in accordance with Schedule 32 (wastewater strategy)~~ ~~2. The reduction of dry weather discharges in order for the target attribute state for Escherichia coli and coastal water objectives for enterococci to be met, and/or the reduction of wet weather discharges in order for the containment standard to be met for the sub-catchment, as relevant to the consent sought~~ ~~3. Measures to achieve reductions of wastewater network catchment discharges~~ ~~4. Measures to achieve any other relevant target attribute states or coastal water objectives including for ecosystem health, nutrients, and visual clarity~~ ~~5. Adverse effects as a result of wastewater network catchment discharges, including cumulative and localised adverse effects on:~~ ~~(i) groundwater, surface water and coastal water, and particularly sites identified in Schedule A (outstanding water~~

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					~~bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule H (contact recreation and Māori customary use) and primary contact sites in Map 85, and~~ ~~(ii) mahinga kai, and~~ ~~(iii) group drinking water supplies and community drinking water supplies~~ ~~6. Effects of population growth and climate change on the network~~ ~~7. Methodology to prioritise the reduction and removal of wastewater network catchment discharges, including proposed information requirements and planned engagement with mana whenua and the community~~ ~~8. The programme and timeframes for implementing improvement measures~~ ~~9. Monitoring and modelling of the wastewater network catchment discharges~~ ~~Notification~~ ~~In respect of Rule WH.R14, applications are precluded from public notification (unless special circumstances exist). Relevant iwi authorities shall be determined to be an affected party to an application under this rule.~~ **The existing wastewater discharges from a local authority a wastewater network catchment, including via a stormwater network, to a surface water body or coastal water or onto or into land where it may enter water, is a restricted discretionary activity provided the resource consent application includes a network management strategy that:** **a) sets out a framework for management of the wastewater network over time to progressively reduce wastewater network catchment discharges in relation to the consent sought, and**

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					b) describes receiving waterbody catchment characteristics, and **c) includes strategic actions and management options to support achievement of target attribute states for nutrients, and E. coli or enterococci, contained in Table 8.4 target attribute state and Table 8.1 coastal water objective.** **Matters for discretion** **1. The contents and implementation of a wastewater network catchment improvement strategy that includes the matters contained within Schedule 32 (wastewater strategy)** **2. The reduction of frequency of dry weather discharges over time in accordance with a responsive management approach to be detailed in the wastewater network catchment improvement strategy, and/or the reduction of wet weather discharges in order for the containment standard to be met for the sub-catchment, as relevant to the consent sought** **3. Measures to support meeting any other relevant target attribute states or coastal water objectives nutrients, and E. coli or enterococci** **4. Adverse effects as a result of wastewater network catchment discharges, including cumulative and localised adverse effects on:** **(i) groundwater, surface water and coastal water, and particularly sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (sites with significant mana whenua values), Schedule H (contact recreation and Māori customary use)** **(ii) mahinga kai, and**

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					(iii) group drinking water supplies and community drinking water supplies **6. Measures to address potential effects of population growth and climate change on the network** **Notification** **In respect of Rule WH.R14, applications are precluded from public notification (unless special circumstances exist). Relevant iwi authorities shall be determined to be an affected party to an application under this rule.** Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.098	8 Whaitua Te Whanganui-a-Tara	Rule WH.R15: Existing wastewater discharges from a treatment plant - discretionary activity.	Amend	Considers condition limiting the load will be very challenging to satisfy, particularly at Moa Point.	Removal of references to load. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.099	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	Notes earthworks activities undertaken by Wellington Water with minor effects would be unable to meet the permitted activity conditions of proposed Rule WH.R23 including minor repairs and maintenance of three waters infrastructure. Notes this proposed rule may mean that hundreds of resource consent applications would be required per annum for minor earthworks activities associated with burst pipe repairs.	Amend to reinstate the exemptions for certain earthworks activities as exist for 'other Whaitua', including for the thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines. Any consequential amendments, to other relevant provisions, which are in general accordance with this request. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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S151.100	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	Provide an exemption for Regionally Significant Infrastructure to reflect the volume of work that needs to be undertaken for RSI	Provide a exemption to (b) for RSI. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.101	9 Te Awarua-o-Porirua Whaitua	Objective P.O1: The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100.	Amend	Considers achieving wai ora by 2100 is a significant task. Considers It unclear what the status of the note is and as currently drafted it creates duplication, noting the last two bullet point are replicated in P.O2.	Alter timeframe to 2123. Clarify the status of the note. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.102	9 Te Awarua-o-Porirua Whaitua	Objective P.O2: Te Awarua-o-Porirua's groundwater, rivers, lakes and natural	Amend	Refer overarching submission points in Section A of submission. Concerned the meaningful improvement may not be achieved by 2040 despite meaningful progress having been made. Considers it likely that the 2040 timeframe will result in the requirement for a large proportion of sub-catchments (or possibly all of them) required to be	Alter timeframe to 2060. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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		wetlands, and their margins are on a trajectory of measurable improvement towards wai ora.		upgraded in the short term, rendering prioritisation upgrades meaningless.	
S151.103	9 Te Awarua-o-Porirua Whaitua	Objective P.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Pāuatahanui Inlet, Onepoto Arm and the open coastal areas of Te Awarua-o-Porirua is maintained or improved to achieve the coastal water	Oppose	Considers CWO contained in Table 9.1 are generally appropriate parameters for coastal environmental health but the lack of information relating to baseline states for Coastal Water Management Units and timeframes to meet the requirements makes it difficult to determine whether improvement can be measured. Unclear how 'maintain or improve' operates for the objectives that don't have a value. Suggests timeframe should refer to 2060 because many ecosystems or habitats will take a long time to recover. 2040 doesn't allow for that recovery time. Refer to Section A of submission regarding Target Attribute States, prioritisation and deliverability. i Suggests the wording 'meaningful progress' would be more appropriate.	Provide further detail in relation to the baseline states and required timeframes in both this objective and Table 8.1. Provide maps showing locations of high contaminant concentrations and amend objective to provide this further detail. In addition to the above, amend as follows: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained, **or meaningful progress has been made towards improvement** ~~or improved~~ to achieve the coastal water objectives set out in Table 8.1, and by ~~2040~~ **2060.** Better define 'high contaminant concentrations' in clause (b) Combine or better distinguish clauses (g) and (h) Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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		objectives set out in Table 9.1.			
S151.104	9 Te Awarua-o-Porirua Whaitua	Table 9.1: Coastal water objectives.	Oppose	Considers the table lacks the required information to set baseline states for the Coastal Water Management Units to assess whether the state is being maintained or improved and lacks timeframes for when the baseline will be determined. Refers to Section A overarching submission points.	Alter timeframe to 2060 and provide further detail is required in relation to the baseline states and required timeframes. Withdraw the table until the further detail can be added. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.105	9 Te Awarua-o-Porirua Whaitua	Objective P.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased, and the long-term population numbers of these species and the area over which they occur are increased, improving their threat	Amend	Not stated	Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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		classification status.			
S151.106	9 Te Awarua-o-Porirua Whaitua	Objective P.O6: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Amend	Considers clause (a) needs to refer to 'meaningful progress' to reflect the reality of how long it will take to deliver improvements and for ecosystems to recover. Refers to submission points on prioritisation, Target Attribute State, and deliverability in Section A of submission, and submission points on Table 9.2 and submission points on Table 8.4. Suggests in clause (d), Huanga needs to refer to Schedule B to provide certainty for applicants.	Revise Clause (a) as follows: 'where a target attribute state in Table 9.2 is not met, the state of that attribute is improved in all rivers and river reaches in the part Freshwater Management Unit so that the target attribute state is met within the timeframe indicated within Table 9.2, **or meaningful progress has been made, and'** Link huanga with Schedule B. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.107	9 Te Awarua-o-Porirua Whaitua	Table 9.2: Target attribute states for rivers.	Oppose	Refers to Section A overarching submission points. Considers there is a general lack of information relating to the baseline state to measure against, meaning it is not possible to determine whether the TAS parameters and requirements are reasonable, appropriate and achievable. Considers that the 2040 timeframe will result in the requirement for a large proportion of sub-catchments (or possibly all of them) to be upgraded in the short term, rendering prioritisation of sub-catchment upgrades meaningless. Refer also previous comments in relation to specific parameters under submission points on Table 8.4.	Provide further information on the baseline state, and a detailed assessment of the implications of the TAS provisions on a sub-catchment basis. Alter timeframe to 2060. Include guidance on how to measure the proportion from WWL's networks with inputs from other sources within the catchment. Withdraw the table until the further detail can be added. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.108	9 Te Awarua-o-Porirua Whaitua	Policy P.P1: Improvement of aquatic ecosystem health.	Amend	Supports the reference in clause (a) to 'progressively reducing the load' as reflecting the volume of work that needs to be achieved. Seeks replacement of 'enhancing' with 'maintaining or improving' in clause (c) as not all locations will require enhancement. Seeks a definition of 'work programmes' in clause	Retain clause (a) Replace 'enhancing' with 'maintaining or improving' in clause (b) Define or use a more specific term for 'work programmes' in clause (d) to clarify that it does not relate to local authority networks Other relief as may be required to address the issues

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				(d) or the use of a more specific term to clarify it does not relate to local authority networks.	identified, including relief that is alternative, additional or consequential.
S151.109	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	Refers to Section A overarching submission points. Considers there is a general lack of information relating to the baseline state to measure against, meaning it is not possible to determine whether the TAS and CWO parameters and requirements are reasonable, appropriate and achievable. Considers it unclear how the TAS, CWO and Freshwater Action Plans will impact upon sub-catchment prioritisation of improvements required for stormwater and wastewater discharges. Questions how 'non-regulatory methods' relate to 'work programmes' in P.P1(d). Considers clause (b) is too vague and needs to clearly state that redevelopment in existing urban areas will be encouraged as that provides opportunities to reduce the existing contaminant load, and that redevelopment will be required to reduce the existing contaminant load. Considers clause (c) needs to make allowance for stormwater discharges that are not creating streambank erosion. Questions if 'networks' be in bold as a defined term in clause (d).	Provide clarification how the FAP provisions will work alongside existing TAS provisions, network discharge consent provisions, and in particular Schedules 31 and 32. Provide clarity over relationship between' non-regulatory methods' and 'work programmes'. Amend policy to the extent necessary to appropriately reflect these interrelationships. In addition to the above, amend provision as follows: (b) encouraging **and where appropriate, requiring that** redevelopment activities within existing urban areas ~~to~~ **shall** reduce the existing urban contaminant load, and (c) imposing hydrological controls on: (i) urban development and (ii) **where appropriate and practicable,** stormwater discharges to rivers **in relation to streambank erosion** Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.110	9 Te Awarua-o-Porirua Whaitua	Policy P.P4: Contaminant load reductions.	Oppose	Refers to Section A overarching submission points. Considers there is a general lack of information relating to the baseline state to measure against, meaning it is not possible to determine whether the CWO parameters and requirements are reasonable, appropriate and achievable. Considers the timeframe of 2040 is too ambitious for the scale of work that needs to be carried out.	Change the timeframe to 2060 and provide further detail in relation to the baseline states and required timeframes. Withdraw the table until the further detail can be added.
S151.111	9 Te Awarua-o-Porirua Whaitua	Table 9.3: Harbour arm catchment contamina	Oppose	Refers to Section A overarching submission points. Considers there is a general lack of information relating to the baseline state to measure against, meaning it is not possible to determine whether the CWO parameters and requirements are reasonable,	Change the timeframe to 2060 and provide further detail in relation to the baseline states and required timeframes. Withdraw the table until the further detail can be added. Other relief as may be required to address the issues

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		nt load reductions .		appropriate and achievable. Considers the timeframe of 2040 is too ambitious for the scale of work that needs to be carried out.	identified, including relief that is alternative, additional or consequential.
S151.112	9 Te Awarua-o-Porirua Whaitua	Table 9.4: Part Freshwater Management Unit sediment load reductions required to achieve the visual clarity target attribute state.	Oppose	Refers to Section A overarching submission points. Considers a detailed assessment of the implications of the TAS provisions is required on a sub-catchment basis to determine appropriateness of the requirements and 2040 timeframes, and implications for sub-catchment prioritisation Considers there is uncertainty regarding the modelled correlation between sediment loads and visual clarity and further assessment is needed. SedNet is a national scale model which has had to be adjusted to the scale of the target TAS locations. This increased granularity may lead to higher levels of uncertainty. Furthermore, sediment loads, visual clarity and deposited sediment are influenced by factors within catchments outside of WWL's control including human land uses and activities and natural factors.	Set TAS for visual clarity and deposited sediment by taking into consideration all contributing sediment sources, and address the following points also need to be addressed: 1. How sediment load reductions will be measured in the future 2. How would proportionate contribution to sediment be measured and any reduction in this contribution be measured Withdraw the table until the further detail can be added. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.113	9 Te Awarua-o-Porirua Whaitua	Policy P.P6: Point source discharges .	Amend	Considers the exclusion of stormwater and wastewater needs to be very explicit.	Amend policy as follows: For ~~The cumulative adverse effects of~~ point source discharges **to water,** ~~excluding~~ **other** than stormwater network and wastewater discharges, ~~to water~~ **cumulative adverse effects** are avoided and: Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.114	9 Te Awarua-o-Porirua Whaitua	Policy P.P9: General stormwater policy to achieve the target attribute	Amend	Considers baseline states cannot be maintained if it is not clear what they are and the reference to table 9.1 should be deleted because it contains no relevant information. Notes the policy could be interpreted as stormwater discharges being the only cause of heavy metal targets not being met, which is not correct and	Amend policy as follows: Stormwater discharges to a surface water body or coastal water, or into or onto land in a manner that may enter freshwater or coastal water, are managed **to support, in a commensurate manner,** ~~so that~~ the baseline water quality state for copper and zinc ~~is~~ **being** maintained, or improved where degraded, including in the relevant part Freshwater Management ~~Unit or coastal water management unit,~~ in

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		states and coastal water objectives.		seeks the timeframes in Table 9.2 should refer to 2060 rather than 2040.	order for the ~~coastal water objectives and~~ target attribute states to be met by the timeframes set out in ~~Tables 9.1 and~~ 9.2. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.115	9 Te Awarua-o-Porirua Whaitua	Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises.	Support	Supports this provision as achieving positive outcomes for water quality.	Retain as notified Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.116	9 Te Awarua-o-Porirua Whaitua	Policy P.P12: Managing stormwater network discharges through a Stormwater Management Strategy.	Amend	Supports the focus on copper and zinc in clause (a). Seeks the deletion of the reference to concentrations in clause (c). Considers the range of target attribute states in clause (d) is too wide and creates uncertainty. Opposes the stormwater network modelling component of clause (e), noting WWL will not model the network in its entirety ahead of starting work on subcatchments, and oppose the requirement to monitor concentrations in discharges, considers concentrations more relevant for receiving waters, and loads appropriate for discharges. Considers clause (f) should focus on modelling to determine the necessary copper and zinc load reduction in stormwater discharges and considers there is no point running a CLM model after	Amend policy as follows: Policy P.P12: Managing stormwater network discharges through a Stormwater Management Strategy~~Stormwater discharges from local authority and state highway networks shall be managed by:~~ ~~(a) reducing the copper and zinc loads in discharges to the coastal water management units of Onepoto Arm and Pāuatahanui Inlet in Map 82 and the harbour arm catchments in Map 84 by 15% for copper and 40% for zinc to contribute to meeting the target attribute states and coastal water objectives for copper and zinc in the Onepoto Arm and Pāuatahanui Inlet of Te Awarua-o-Porirua, and~~ ~~(b) reducing the copper and zinc loads in discharges to the Open Coast coastal water management units to contribute to meeting the coastal water objectives to maintain or improve, and~~

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				implementation because it will provide the same information as pre-implementation. Considers the plan sets many different priorities in different provisions making the prioritisation in clause (g) meaningless and it is unclear how clauses (f) and (g) would interact. Notes the plan uses different terms that mean the same thing and it is unclear whether these terms are intended to be applied in the same way, for example, in this policy: (i) 'Contribute to' (ii) 'Supporting the achievement of' Refers to overarching Section A of submission, particularly in relation to prioritisation, TAS, modelling and monitoring.	~~(c) reducing the concentration and contaminant loads of copper and zinc from discharges to surface water bodies in order to maintain, and in degraded part Freshwater Management Units improve, the water quality state for dissolved copper and zinc to contribute to meeting the target attribute states in those part Freshwater Management Units, and~~ ~~(d) supporting the achievement of any other relevant target attribute states or coastal water objectives including for ecosystem health, nutrients, visual clarity and Escherichia coli or enterococci, and~~ ~~(e) implementing a stormwater management strategy and stormwater management plans prepared in accordance with the information and requirements set out in Schedule 31 (stormwater strategy - whaitua), and~~ ~~(f) monitoring and modelling the stormwater network to identify catchments to be prioritised, the copper and zinc concentrations and loads in the discharge, and changes in discharge volume and quality over time following improvements in the network infrastructure, and~~ ~~(g) prioritising the reduction, removal, and/or treatment of stormwater discharges to Schedule A (outstanding water bodies) or Schedule C (mana whenua) sites, or mahinga kai.~~ **Stormwater discharges from local authority and state highway networks shall be managed by:** **(a) reducing the copper and zinc loads in discharges to the coastal water management units of Onepoto Arm and Pāuatahanui Inlet in Map 82 and the harbour arm catchments in Map 84 by 15% for copper and 40% for zinc to contribute to meeting the target attribute states and coastal water objectives for copper and zinc in the**

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					Onepoto Arm and Pāuatahanui Inlet of Te Awarua-o-Porirua, and **(b) reducing the copper and zinc loads in discharges to the Open Coast coastal water management units to contribute to meeting the coastal water objectives to maintain or improve, and** **(c) reducing the contaminant loads of copper and zinc from discharges to surface water bodies in order to maintain, and in degraded part Freshwater Management Units improve, the water quality state for dissolved copper and zinc to contribute to meeting the target attribute states in those part Freshwater Management Units, and** **(d) supporting the achievement of relevant target attribute states or coastal water objectives for nutrients and E. coli or enterococci, and** **(e) implementing a stormwater management strategy and stormwater management plans prepared in accordance with the information and requirements set out in Schedule 31 (stormwater strategy - whaitua), and** **(f) modelling the copper and zinc loads in the discharge, and** **(g) in order to implement the objectives and policies, prioritising the improvement of discharges in stormwater sub-catchments using a methodology to be set out in a Stormwater Management Strategy prepared in accordance with Schedule 31, that will include engagement with mana whenua and take into account:** **i. Schedule A (outstanding water bodies)** **ii. Schedule C (sites with significant mana whenua values)** **iii. Schedule F (Ecosystems and habitats with significant indigenous biodiversity)**

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					iv. Schedule H (contact recreation and Māori customary use) **v. Map 85 (Primary contact sites - Te Whanganui-a-tara)** **vi. impacts on group drinking water supplies or community drinking water supplies** **vii. efficiency and alignment with other work programmes including work in accordance with a wastewater network catchment improvement strategy or sub-catchment improvement plan** **viii. investment availability** **ix. public health effects** **x. modelling results** **xi. effects on the environment.** Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.117	9 Te Awarua-o-Porirua Whaitua	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Supports the intent of this policy, but is unsure if a mean annual runoff target is the most appropriate measure. Queries whether this should be mean rather than median, and how easy this will be for developers or Wellington Water to assess compliance. Considers ready made 'acceptable solutions' may be easier to implement.	Review policy, in particular the reference to mean annual runoff, to ensure that the policy imposes targets that are readily measurable, able to be easily implemented, and clearly relate to the effects of runoff on the environment. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.118	9 Te Awarua-o-Porirua Whaitua	Policy P.P16: General wastewater policy to achieve target attribute states and	Amend	Refers to Section A overarching submission points and submission points on Tables 9.1 and 9.2. Notes the policy could be interpreted as wastewater discharges being the only cause of e coli targets not being met, which is not correct.	Provide further information on the baseline state, and a detailed assessment of the implications of the TAS provisions on a sub-catchment basis. Include guidance on how to measure the proportion from WWL's networks with inputs from other sources within the catchment. In addition to the further information requested above and any subsequent changes to this policy needed as a result of

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		coastal water objectives.			this additional assessment, revise the policy to reflect the proportionate effect of discharges, as follows: Wastewater discharges to a surface water body or coastal water, or into or onto land in a manner that may enter freshwater or coastal water are managed **to support, in a commensurate manner,** ~~so that~~ the baseline water quality state for Escherichia coli or enterococci is being maintained, or improved where degraded, including in the relevant part Freshwater Management Unit or coastal water management unit, in order for the target attribute states and coastal water objectives to be met by the timeframes set out in Tables 9.1 and 9.2. Refer to proposed "commensurate" definition within this submission as follows: Commensurate: In the context of reductions in contaminants in wastewater or stormwater discharges, means a level of reduction that is both proportionate to the effect of the discharge on the receiving environment, and reasonably within the control of the applicant. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.119	9 Te Awarua-o-Porirua Whaitua	Policy P.P17: Progressing works to meet Escherichia coli target attribute states.	Oppose	Considers the purpose of policy is unclear and it implies that wastewater networks are the only source of e coli. References comments on prioritisation in Section A of submission.	Delete Policy Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.120	9 Te Awarua-	Policy P.P18: Managing	Amend	Refers to Section A overarching submission points on modelling and prioritisation. Considers the policy should only relate to	Remove references to monitoring and modelling in this context. Amend provisions as follows:

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	o-Porirua Whaitua	wastewater network catchment discharges.		discharges within the public network and privately owned wastewater pipes should not be included. Considers frequency is a more appropriate metric than volume for wastewater overflows in the network in clauses (a), (c), (g) and (h). Considers it unclear in clause (a) whether wet weather overflows are related to target attribute states and coastal water objectives. Notes policies WH.P19 and P.P18 direct that wet weather overflows are reduced to meet or exceed the containment standard but other provisions (e.g. Schedule 32) suggest that wet weather overflows are relevant to target attribute states and coastal water objectives. Supports the focus on containment standard. Considers prioritisation in clause (b) as meaningless and it is not clear how this would work with clause (h). Considers the reference to 'potential' discharges in Clause (c) is unclear and so should be deleted. Considers clause (e): should also mention kaitiaki monitoring. Supports the intent of Clause (f) but is concerned it is not practicable. Notes that for clause (h) Wellington Water is not able to model E. coli or enterococci concentrations or load in network overflows, and instead must use the frequency as a proxy for this.	Policy P.P18: Managing wastewater network catchment discharges ~~All wastewater network catchment discharges, including those which discharge via a stormwater network, shall be managed by:~~ ~~(a) progressively reducing the frequency and/or volume of wet weather overflow events to meet or exceed the containment standard of no more than 2 per year through the implementation of the methodologies set out in a Wastewater Network Catchment Improvement Strategy prepared in accordance with Schedule 32 (wastewater strategy), and~~ ~~(b) prioritising the removal of wet weather overflows in wastewater network sub-catchments where wet weather overflows are discharging to Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule H (contact recreation and Māori customary use) sites and mahinga kai, and~~ ~~(c) progressively reducing the frequency and/or volume of dry weather discharges or the potential for these discharges through the implementation of a Wastewater Network Catchment Improvement Strategy prepared in accordance with Schedule 32 (wastewater strategy) to contribute to meeting the target attribute states for Escherichia coli in Table 9.2 and the coastal water objectives for enterococci as set out in Table 9.1, and~~ ~~(d) implementing an inflow and infiltration programme to proactively upgrade the pipe network to progressively reduce stormwater and groundwater infiltration and inflow into the wastewater network catchment, and~~ ~~(e) engaging with mana whenua on their values and interests in relation to discharges and receiving waters, including adverse effects on Māori customary use and mahinga kai, and~~

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					~~(f) avoiding wastewater network catchment discharges entering private property or educational facilities, and~~ ~~(g) avoiding increasing the frequency and/or volume of wastewater network catchment discharges as a result of climate change, or new urban development and intensification, and~~ ~~(h) monitoring and modelling the wastewater network catchment to identify catchments to be prioritised, the Escherichia coli or enterococci concentration in the discharge, and changes in discharge frequency, volume and quality over time following improvements in the network infrastructure.~~ **All existing wastewater discharges from a local authority wastewater network catchment including those which discharge via a stormwater network, shall be managed by:** **(a) progressively reducing the frequency of wet weather overflow events to meet or exceed the containment standard of no more than 2 per year through the implementation of the methodologies set out in a wastewater network catchment improvement strategy prepared in accordance with Schedule 32 (wastewater strategy), and** **(b) reducing the frequency of dry weather discharges over time, in accordance with a responsive management approach to be detailed in the wastewater network catchment improvement strategy, and** **(c) in order to implement the objectives and policies of the Regional Plan, prioritising the reduction of wet weather overflows in wastewater network sub-catchments using a methodology to be set out in the wastewater network catchment improvement strategy prepared in accordance with Schedule 32 (wastewater strategy), that will include engagement with mana**

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					whenua and take into account the following: i. Schedule A (outstanding water bodies) ii. Schedule C (sites with significant mana whenua values) iii. Schedule H (contact recreation and Māori customary use) iv. Map 85 (Primary contact sites - Te Whanganui-a-tara) v. impacts on group drinking water supplies or community drinking water supplies vi. efficiency and alignment with other work programmes including stormwater improvement works under a stormwater management strategy or stormwater management plan vii. investment availability viii. public health effects ix. modelling results x. environmental effects (d) implementing an inflow and infiltration programme to proactively upgrade the pipe network to progressively reduce stormwater and groundwater infiltration and inflow into the wastewater network catchment, and (e) engaging with mana whenua on their values and interests in relation to discharges and receiving waters, including adverse effects on Māori customary use and mahinga kai, and on-going opportunities for kaitiaki monitoring provided by mana whenua, and (f) avoiding, where practicable, wastewater network catchment discharges entering private property or educational facilities, or where it is not practicable to avoid them, implementing a methodology for resolution, and (g) avoiding increasing the frequency of

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					wastewater network catchment discharges as a result of climate change, or new urban development and intensification, and **(h) monitoring and/or modelling the wastewater network to understand changes in discharge frequency over time following improvements in the network infrastructure.** Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.121	9 Te Awarua-o-Porirua Whaitua	Policy P.P19: Managing existing wastewater treatment plant discharges.	Amend	Considers the policy will disincentivise long outfalls as there is no recognition of the benefits of pollution dispersal, the receiving environment (depth and turbulence) and ecology. A more lenient approach to Coastal environments should be applied as they are not subject to bottom lines and limits pursuant to the NPS-FM. Notes all Wellington Water's wastewater activities seem to be subject to improvement, regardless of whether the improvement is warranted or not, and considers a more focused approach would be beneficial their WWTP discharges to marine environments have limited impact on the environment and should be enabled. Seeks clause (a) be amended so the requirement to maintain the entercocci load for coastal water is altered to: continue to meet the coastal water objective. For Clause (f), questions why mahinga kai need to be monitored within the zone of reasonable mixing and suggests it should only be at the outer extent.	Delete and replace with policy that: • Recognises the benefits of WWTPs and their limited impacts on the environment • Recognises the differences between coastal and freshwater environments • Enables consideration of the benefits of dispersal, environmental effects and receiving environment rather than just treating all discharges the same • Maintains clause (c) and builds in kaitiaki monitoring, rather than relying on a note • Remove the requirement for mahinga kai monitoring in the zone of reasonable mixing Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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				Suggests the directiveness of the note is unusual and it would work better as part of clause (c).	
S151.122	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Amend	Considers this excessive given the scale of work that needs to be delivered for Te Mana o te Wai and an exemption is required for Regionally Significant Infrastructure	Amend to provide an exemption for Regionally Significant Infrastructure. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.123	9 Te Awarua-o-Porirua Whaitua	Rule P.R1: Point source discharges of specific contaminants - prohibited activity.	Amend	Supports the intent of this rule and associated policy but is concerned it may impact on Wellington Water's stormwater and wastewater discharges.	Add new clause to the end of the existing rule as follows: ... **Noting that this rule does not apply to the discharge of contaminants collected as part of stormwater management as a result of precipitation or part of the operation of the wastewater network.** OR as alternative relief, define "point source discharge" so as to exclude discharges from the stormwater wastewater networks Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.124	9 Te Awarua-o-Porirua Whaitua	Rule P.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Amend	Concerned that (f) and (g) should not be occurring even if they are via the stormwater network and that it is the landowners responsibility to resolve.	Amend Rule as follows: ... ~~and where the discharge is not via an existing local authority stormwater network the discharge shall also not:~~ Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.125	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redevelop	Amend	Considers clause (c) is too vague as it does not specify what the hydrological controls have to achieve, and that compliance with a rainfall depth is required Concerned that (f) and (g) should not be occurring	Greater specificity in clause (c), including a requirement to retain a specific depth of rainfall. Delete the following clause: ~~and where the discharge is not via an existing local authority stormwater network the~~

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		ed impervious surfaces - permitted activity.		even if they are via the stormwater network and that it is the landowners responsibility to resolve.	~~discharge shall also not:~~ Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.126	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Questions if clause (e) is missing a word after 'mean annual runoff' such as 'volume' or 'load'?	Consider if clause (e) requires an extra word. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.127	9 Te Awarua-o-Porirua Whaitua	Rule P.R8: Stormwater from a local authority or state highway network- restricted discretionary activity.	Amend	Considers the requirement to progressively improve discharge quality may be excessive in some locations in relation to some or all target attribute states. Considers the rule will be hard to satisfy and applications will become non-complying activities with avoid policies in place. Notes the conditions contain matters of uncertainty (e.g. accordance with Schedule 31) and it's unclear how these would work with matters of discretion with a circular loophole created. Seeks the addition of R93 to the list of provisions that will no longer apply to Whaitua Te Whanganui-a-Tara or Te Awarua-o-Porirua Whaitua. Supports the exclusion of discharges from high risk industrial or trade premises. Considers matter of discretion (3) needs to be altered to reflect that Wellington Water's stormwater network isn't the only source of contamination. Considers matter of discretion (5) duplicates	Amend rule as follows: Rule P.R8: Stormwater from a local authority or state highway network - restricted discretionary activity~~The discharge of stormwater into water, or onto or into land where it may enter water, from a local authority or state highway stormwater network, including discharges via another stormwater network, except those from a high risk industrial or trade premise, is a restricted discretionary activity, provided the resource consent application includes a stormwater management strategy prepared in accordance with, Schedule 31 (stormwater strategy - whaitua) to progressively improve discharge quality, including a reduction of copper and zinc commensurate with what is required in the receiving environment to meet the target attribute state in Tables 9.2 or coastal water objective in Table 9.1 for the relevant part Freshwater Management Unit or coastal water management unit.~~ ~~Matters for discretion~~ ~~1. The contents and implementation of a stormwater management strategy prepared in accordance with Schedule 31 (stormwater strategy - whaitua)~~ ~~2. The reduction of copper and zinc where required in order for the target attribute state or coastal water objective for these attributes to be met~~

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				information required by matter of discretion (1) and should be deleted. Considers matter of discretion (6) is too broad and needs to be reduced to scope so that: (a) Hydrological controls only relate to streambank erosion (b)WWL are not involved in offsetting discharges from greenfield development. Seeks that matter of discretion (7) be deleted as Wellington Water's programme for implementation will be decided after resource consent has been granted. Notes that whilst local authority stormwater rules specifically identify that they do not cover discharges from high risk sites, the rules do not provide the same clarity with respect to redevelopment and new development during construction. Notes the stormwater application may need to address the effects of stormwater discharges from construction redevelopment and new development which is inconsistent with the policies that signal that Wellington Water does not have full control over high risk industrial and trade premises, and for new development and redevelopment. Refers to Section A of submission for additional context.	~~3. Measures to achieve any other relevant target attribute states or coastal water objectives including for ecosystem health, nutrients, visual clarity and Escherichia coli or enterococci~~ ~~4. Adverse effects, including cumulative and localised adverse effects, on:~~ ~~(i) groundwater, surface water and coastal water, and particularly sites identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori customary use), and~~ ~~(ii) group drinking water supplies and community drinking water supplies~~ ~~5. Methodology to prioritise the reduction, removal, and/or treatment of stormwater discharges, including information requirements and engagement with mana whenua and the community~~ ~~6. The use of hydrological controls and water sensitive urban design measures to mitigate adverse effects of stormwater discharges, provide communal stormwater treatment, or offset discharges arising from new greenfield development~~ ~~7. The programme and timeframes for implementing measures and/or capital works~~ ~~8. Monitoring and modelling of the stormwater network~~ ~~Notification~~ ~~In respect of Rule P.R8, applications are precluded from public notification (unless special circumstances exist).~~ ~~Relevant iwi authorities shall be determined to be an affected party to an application under this rule.~~ ~~Note~~ ~~In respect of the discharge from an existing high risk industrial or trade premise, refer to Rule P.R4. Other existing discharges of stormwater into the local authority stormwater network will be managed under this rule by the local authority or the relevant water authority.~~ **The discharge of stormwater into water, or onto or into land including where it may enter water, from a local**

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					authority or state highway stormwater network, including discharges via another stormwater network, except those from a high risk industrial or trade premise, is a restricted discretionary activity, provided the resource consent application includes a stormwater management strategy that: a. Sets out a framework for management of the stormwater network over time to improve the adverse acute, chronic and cumulative effects of stormwater discharges on surface water bodies, groundwater and coastal water, b. Identifies catchment characteristics, c. Includes strategic actions and management options to: i. reduce copper and zinc loads, and ii. make progress towards relevant target attribute states for nutrients and E. coli or enterococci; and iii. reduce stream bank erosion; and d. Addresses localised effects Matters for discretion 1. The contents and implementation of a stormwater management strategy prepared in accordance with Schedule 31 (stormwater strategy - whaitua) 2. The methodology for reducing copper and zinc where required in order to contribute to meeting the target attribute state or coastal water objective for these attributes 3. Measures to contribute to meeting other relevant target attribute states or coastal water objectives for nutrients and Escherichia coli or enterococci 4. Adverse effects, including cumulative and localised adverse effects, on: (i) groundwater, surface water and coastal water, and particularly sites identified in Schedule A (outstanding water bodies), Schedule C (sites with significant mana whenua values), Schedule F (ecosystems and habitats with significant indigenous biodiversity), Schedule H (contact recreation and Māori customary use), and

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					(ii) group drinking water supplies and community drinking water supplies **5. Methods to address streambank erosion.** **Notification** **In respect of Rule P.R8, applications are precluded from public notification (unless special circumstances exist). Relevant iwi authorities shall be determined to be an affected party to an application under this rule.** **Note** **In respect of the discharge from an existing high risk industrial or trade premise, refer to Rule P.R4. Other existing discharges of stormwater into the local authority stormwater network will be managed under this rule by the local authority or the relevant water authority.** Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.128	9 Te Awarua-o-Porirua Whaitua	Rule P.R13: Wastewater network catchment discharges to water - restricted discretionary activity.	Amend	Concerned the rule will be hard to satisfy and applications will become non-complying activities with avoid policies in place. Refer activity status points in Section A. Seeks the addition of R93 to the list of provisions that will no longer apply to Whaitua Te Whanganui-a-Tara or Te Awarua-o-Porirua Whaitua and the matters of discretion need to avoid duplication with Schedule 32. Considers that the matters of discretion are uncertain, 'in accordance with' is not a matter of fact. Considers there is duplication between clauses (1) and (2)-(9) and many of these clauses are unclear.	Amend rule as follows: Rule P.R13: Wastewater network catchment discharges to water - restricted discretionary activity ~~The existing wastewater discharge from a wastewater network catchment, including via a stormwater network, to a surface water body or coastal water or onto or into land where it may enter water, is a restricted discretionary activity provided the resource consent application includes:~~ ~~(a) a strategy to progressively reduce and remove wastewater network catchment discharges in relation to the consent sought, in accordance with the requirements of Schedule 32 (wastewater strategy), and~~ ~~(b) the reduction of Escherichia coli or enterococci proposed in the strategy is commensurate with what is required in the receiving environment to meet the target attribute state in Table 9.2 or coastal water objective in Table~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Refers to Section A of submission for additional context regarding prioritisation, target attribute states, modelling and monitoring.	~~9.1 for the relevant part Freshwater Management Unit or coastal water management unit.~~ ~~Matters for discretion~~ ~~1. The contents and implementation of a wastewater network catchment improvement strategy prepared in accordance with Schedule 32 (wastewater strategy)~~ ~~2. The reduction of dry weather discharges in order for the target attribute state for Escherichia coli and coastal water objectives for enterococci to be met, and/or the reduction of wet weather discharges in order for the containment standard to be met for the sub-catchment, as relevant to the consent sought~~ ~~3. Measures to achieve reductions of wastewater network catchment discharges~~ ~~4. Measures to achieve any other relevant target attribute states or coastal water objectives including for ecosystem health, nutrients, and visual clarity~~ ~~5. Adverse effects as a result of wastewater network catchment discharges, including cumulative and localised adverse effects on:~~ ~~(i) groundwater, surface water and coastal water, and particularly sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule H (contact recreation and Māori customary use) and~~ ~~(ii) mahinga kai, and~~ ~~(iii) group drinking water supplies and community drinking water supplies~~ ~~6. Effects of population growth and climate change on the network~~ ~~7. Methodology to prioritise the reduction and removal of wastewater network catchment discharges, including proposed information requirements and planned engagement with mana whenua and the community~~ ~~8. The programme and timeframes for implementing~~

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					~~improvement measures~~ ~~9. Monitoring and modelling of the wastewater network catchment discharges~~ ~~Notification~~ ~~In respect of Rule P.R13, applications are precluded from public notification (unless special circumstances exist).~~ ~~Relevant iwi authorities shall be determined to be an affected party to an application under this rule.~~ **The existing wastewater discharge from a local authority wastewater network catchment, including via a stormwater network, to a surface water body or coastal water or onto or into land where it may enter water, is a restricted discretionary activity provided the resource consent application includes a network management strategy that:** **(a) sets out a framework for management of the wastewater network over time to progressively reduce wastewater network catchment discharges in relation to the consent sought, and** **(b) describes the receiving waterbody catchment characteristics, and** **(c) includes strategic actions and management options to support achievement of target attribute states for nutrients, and E. coli or enterococci, contained in Table 8.4 target attribute state and Table 8.1 coastal water objective.** **Matters for discretion** **1. The contents and implementation of a wastewater network catchment improvement strategy that includes the matters contained within Schedule 32 (wastewater strategy)** **2. The reduction of frequency of dry weather discharges over time in accordance with a responsive management approach to be detailed in the wastewater**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					network catchment improvement strategy, and/or the reduction of wet weather discharges in order for the containment standard to be met for the sub-catchment, as relevant to the consent sought **3. Measures to support meeting any other relevant target attribute states or coastal water objectives nutrients, and E. coli or enterococci** **4. Adverse effects as a result of wastewater network catchment discharges, including cumulative and localised adverse effects on:** **(i) groundwater, surface water and coastal water, and particularly sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (sites with significant mana whenua values), Schedule H (contact recreation and Māori customary use) and** **(ii) mahinga kai, and** **(iii) group drinking water supplies and community drinking water supplies** **5. Measures to address potential effects of population growth and climate change on the network** **Notification** **In respect of Rule P.R13, applications are precluded from public notification (unless special circumstances exist). Relevant iwi authorities shall be determined to be an affected party to an application under this rule.** Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.129	9 Te Awarua-o-Porirua Whaitua	Rule P.R14: Existing wastewater	Amend	Considers condition limiting the load will be very challenging to satisfy.	Removal of references to load. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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		discharges from a treatment plant to coastal and freshwater - discretionary activity.			
S151.130	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Amend	Notes earthworks activities undertaken by Wellington Water with minor effects would be unable to met the permitted activity conditions of proposed Rule WH.R22 including minor repairs and maintenance of three waters infrastructure. Notes that this proposed rule may mean that hundreds of resource consent applications would be required per annum for minor earthworks activities associated with burst pipe repairs.	Amend Rule to reinstate the exemptions for certain earthworks activities as exist for 'other Whaitua', including for the thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines. Any consequential amendments, to other relevant provisions, which are in general accordance with this request.
S151.131	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Amend	Provide an exemption for Regionally Significant Infrastructure to reflect the volume of work that needs to be undertaken for RSI	Provide an exemption to (b) for RSI. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.132	12 Schedules	Schedule 27: Freshwater Action Plan requirements.	Amend	Seeks confirmation that actions in the Freshwater Action Plans will not be additional to the requirements of Schedules 31 and 32 for operation of the wastewater and stormwater networks. Considers the provisions are unclear as to how these align with other strategies/plans and how they will work with other regulatory provisions including the level of influence in relation to wastewater and stormwater network discharge consents and prioritisation of sub-catchments.	Amend to clarify how the FAP provisions will work alongside TAS provisions, network discharge consent provisions, and in particular Schedules 31 and 32. Amend to clarify what is intended for the level of consideration or influence that any FAP could have on wastewater and stormwater network discharge consents. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers it unclear how the proportion of pollution reduction from the Freshwater Action Plans will be calculated, so that other parties can calculate the commensurate reduction from their activities. Refers to overarching submission points in Section A of submission.	
S151.133	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	In general the wording and contents of the schedule may have implications for prioritisation methodologies and implementation, which have been addressed in overarching submission points in Section A. Refers to the summary of relief sought in relation to Schedules 31 and 32.	Amend to address the submission points outlined in Section A of submission regarding prioritisation methodologies and implementation. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.134	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Considers the SMS should only provide high level information as it is to be submitted with the resource consent application and a number of the information requirements in Schedule 31 are too onerous and/or require too much detail for a strategy. Considers that it would be more appropriate to include specific information (for example, identifying locations for the retention or detention of stormwater flows or volumes) in the SCaMPs.	Not stated
S151.135	12 Schedules	Schedule 31: Stormwater Management	Oppose	Considers the reference to "in accordance with relevant objectives and policies of the Plan" in Clause 1 does not serve a clear purpose as schedules should be considered in the context of the overall Plan by default. Considers this reference invites second guessing	Reframe clause 1 as an information requirement., e.g., "describes how it responds to the relevant objectives and policies in the plan". Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.		and the exercise of subjective judgement from decision-makers (or submitters), which is not appropriate in a Schedule and could affect an application's activity status. Suggests clause is reframed as an information requirement to describe how the strategy responds to the relevant objectives and policies in the Plan.	
S151.136	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Clause 2: groundwater Seeks clarity on the references to and requirements in relation to groundwater throughout PC1. Refers to overarching submission point on Groundwater in Section A of submission.	Clarify the references to and requirements in relation to groundwater throughout PC1. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.137	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Clause 3: - Considers there is insufficient information to model first flush discharges and the clause needs to be rewritten so that this action is not responsible for achieving TAS.	Address the lack of information regarding first flush discharges and rewrite end of clause as follows: '... will be reduced in order ~~for~~ **to support** the target attribute state... Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.138	12 Schedules	Schedule 31: Stormwater Managem	Amend	Clause 4: Opposes the use of the term "concentration" as it is difficult to identify and establish what this means in real terms. Opposes the reference to contaminant	Amend Clause 4 as follows: identifies the contaminant load ~~and concentrations~~ for copper and zinc arising from the applicable local authority or state highway stormwater network discharges using modelling and monitoring, and

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		ent Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.		concentrations in clause 4 (and elsewhere throughout PC1). The "concentration" in the discharge effectively is meaningless as it is immediately diluted as it enters the receiving water. Considers identifying contaminant load in the discharge is more appropriate as it can be measured, modelled, and then reduced.	Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.139	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Clause 5: Considers that stormwater should be considered as part of the context of the wider environment. Notes Wellington Water can reduce loading, but cannot model how reduction will result in achieving the TAS without a larger, regional-scale model and that there is no common link across different catchments that can be used to correlate loading and TAS. Seeks the wording of "commensurate" be amended to improve clarity. Opposes the requirement to identify 'commensurate reductions' as discussed in Section A of their submission. Seeks alternative wording and acknowledgement that the details may not be able to be confirmed until the SCaMP (SMP) stage.	Amend Clause 5 as follows:~~identifies~~ **describes the approach to determining (through Stormwater Management Plans)** the reduction of copper and zinc **to be achieved** needed in the stormwater network discharge ~~that is commensurate with that required in the receiving environment to meet~~ **in order to contribute to meeting** the target attribute state or coastal objective for the part Freshwater Management Unit or coastal water management unit **in the receiving environment,** and Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.140	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Clause 7: Questions the use of the term "avoid" as avoiding the adverse effects of stormwater would include issues out of the control of Wellington Water, for example, flooding on properties. Considers it is not achievable for Wellington Water to actively maintain or re-establish natural flow regimes as there are too many factors outside their control.	Amend Clause 7 as follows: describes actions to maintain or re-establish natural flow regimes **to avoid, to the extent practicable,** ~~including the use of hydrological controls to avoid~~ adverse effects of stormwater quantity (flows and volumes) and maintain, to the extent practicable, natural stream flows, and Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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S151.141	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Clause 8: Considers it more appropriate to identify the content of Cl8 in Sub-catchment Management Plans (SCaMPs) rather than the Stormwater Management Strategy itself.	Delete Clause 8, or amend as follows: identifies ~~locations and~~ opportunities for the retention or detention of stormwater flows or volumes, **and how these will be implemented via the SMPs** and Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.142	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Clause 9: Considers community engagement is too onerous and should not be a requirement.	Delete reference to 'community' from clause 9. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.143	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te	Oppose	(a)(vi): Questions why this includes HAIL and is not limited to "industrial and trade premises" as HAIL is broader regarding the activities it covers and as industrial and trade premises will require their own approvals, this should not be a matter for schedule 31	Delete clause or if clauses (a)(vi) to (ix) are not deleted in their entirety, then move them to the Stormwater Management Plan requirements at the end of Schedule 31. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Awarua-o-Porirua.			
S151.144	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Oppose	(a)(vii): Considers this information request is overly onerous	Delete clause or if clauses (a)(vi) to (ix) are not deleted in their entirety, then move them to the Stormwater Management Plan requirements at the end of Schedule 31. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.145	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Oppose	(a)(viii): Considers this information would be needed for concentrations but that Wellington Water will only be modelling and managing "loads" not concentrations, and that it is overly onerous.	Delete clause or if clauses (a)(vi) to (ix) are not deleted in their entirety, then move them to the Stormwater Management Plan requirements at the end of Schedule 31. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.146	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara	Oppose	(a)(ix): Considers this clause is overly onerous	Delete clause or if clauses (a)(vi) to (ix) are not deleted in their entirety, then move them to the Stormwater Management Plan requirements at the end of Schedule 31. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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		and Te Awarua-o-Porirua.			
S151.147	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Strategic actions: Supports Schedule 31 not requiring the prioritisation of sub-catchments to be completed in the SMS, but considers the plan does not provide a sensible approach to the prioritisation.	Amend provision as follows: (b) set out the methodology, including information requirements and engagement with **mana whenua** and the community, to support the decision-making to be used to prioritise all catchments or sub-catchments for implementation actions and mitigation measures **specified in the SMS** ~~to maintain, or improve where degraded, the receiving water quality, as well as the relevant matters to be considered,~~ **which shall include but not be limited to (in no particular order):** **Schedule A (outstanding water bodies)** **Schedule C (mana whenua)** **Schedule F (sites of significance)** **Schedule H (contact recreation and Maori customary use)** **Primary contact sites in Map 85** **impacts on group drinking water supplies or community drinking water supplies** **efficiency and alignment with other work programmes including Wastewater Network Improvement Strategy or Sub-catchment Improvement Plan;** **investment availability** **public health effects** **modelling results**

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					effects on the environment ~~including to meet the target attribute states or coastal objectives for copper and zinc and avoid or reduce the effects of stormwater discharges to Schedule A (outstanding water bodies), Schedule C (mana whenua) and mahinga kai sites, and group drinking water supplies and community drinking water supplies, and~~ Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.148	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Management options (d): Seeks clarification as to whether this includes both public and private treatment in relation to 'communal stormwater'. Considers the detail of this should be provided at SMP stage.	Amend to clarify and address the split between SMS and SMP. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.149	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Management options (e): Seeks clarification on whether this is offsetting or a clawback	Amend to clarify. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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S151.150	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Oppose	Management options (f): Considers this should be in the SCaMPs as it is too specific for the SMS.	Delete clause (f). Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.151	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Management options (g): Requires amendment to reflect extent of Wellington Water's control by referring to cross connections in the public network	Amend clause (g) as follows: Describe the programme to investigate and reduce the number of ~~illegal~~ **public network** cross-connections, and Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.152	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te	Amend	Management options (h): Suggests alternative wording of "to support achieving the outcomes" instead of "to support the modelling" as there is no guarantee the model would use these types of inputs. Suggests this needs to be addressed only at the high level in the SMS, with detail for the SMPs.	Amend management options (h) as follows: **broadly** describe the mātauranga monitoring, ~~receiving environment monitoring,~~ and monitoring to be undertaken to support the ~~modelling~~ **outcomes** ~~(if any),~~ **noting that it may be more appropriate for matters of detail to be confirmed in the Stormwater Management Plans,** and Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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		Awarua-o-Porirua.			
S151.153	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Oppose	Localised effects (j): Considers this is too specific for the SMS stage and is more appropriate to be addressed in the SCaMPs.	Delete clause (j). Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.154	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Stormwater management plans: Supports the general approach towards stormwater management plans, particularly that they can be developed and implemented over time. Considers chapeau needs to be rewritten so it is clear that Wellington Water's actions will contribute to the solution, not be the solution. Notes the reference should be to 'sub-catchment', not 'catchment'.	Amend Stormwater Management Plans chapeau as follows: Stormwater Management Plans for each stormwater **sub-**catchment shall provide details of the actions and locations of stormwater treatment systems to be implemented. These plans are intended to be prepared and implemented over time for each of the stormwater catchments or sub-catchments, or smaller geographical areas if deemed appropriate. Stormwater Management Plans shall be produced based on the prioritisation of sub-catchments or areas set out in the Stormwater Management Strategy and will set out how stormwater discharges in that area will be managed ~~in order for~~ **to support meeting** the target attribute states and coastal water objectives for copper and zinc ~~to be met.~~ Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.155	12 Schedules	Schedule 31: Stormwater Managem	Amend	Review of Stormwater Management Strategy (SMS): Seeks clarity about what information is required to be included in the first iteration of the SMS on the actions needed to meet TAS and CWO (coastal	Provide clarification regarding information requirements for TAS and CWO. Amend chapeau as follows: Stormwater Management Strategies will be adaptive and

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		ent Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.		water objectives). Seeks refinements so that Wellington Water's actions are not required to meet the TAS but to contribute to meeting them. Seeks that reference to modelling and monitoring are altered to reflect roles of Wellington Water and GW.	updated as catchment characteristics, monitoring data, and information changes, and new technology becomes available. A Stormwater Management Strategy must be reviewed and certified by Wellington Regional Council on a regular basis and at least once every 10 years. The actions needed to **contribute to** ~~meet~~ the target attribute states and coastal water objectives will be defined as far as practicable in the first iteration of the strategy and should be refined through regular reviews. The reviews shall be guided by modelling and monitoring undertaken by the consent holder **regarding contaminant loads and modelling undertaken by Greater Wellington in relation to receiving environments** and monitoring undertaken by the consent holder, and monitoring undertaken by the Wellington Regional Council in accordance with the National Policy Statement for Freshwater Management 2020. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.156	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Seeks new clause to clarify the role of the SMS in relation to various policies in the plan.	Add a new clause as follows:**Note: to avoid doubt, a Stormwater Management Strategy prepared in accordance with this Schedule is not required to address the matters in:** **Policy WH.P5 : Localised adverse effects of point source discharge;** **Policy WH.P6: Cumulative adverse effects of point source discharges;** **Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises** **Policy WH.P12: Managing stormwater from a port or airport;** **Policy WH.P14: Stormwater discharges from new and**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					redeveloped impervious surfaces; **Policy WH.P15: Stormwater contaminant offsetting for new greenfield development;** **Policy WH.P16: Stormwater discharges from new unplanned greenfield development;** **Policy P.P5: Localised adverse effects of point source discharges;** **Policy P.P6: Point source discharges;** **Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises;** **Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces;** **Policy P.P14: Stormwater contaminant offsetting for new greenfield development;** **Policy P.P15: Stormwater discharges from new unplanned greenfield development.** Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.157	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Notes the wording and contents of the schedule may have implications for prioritisation methodologies and implementation, which have been addressed in overarching submission points in Section A. Refers to other relevant overarching submission points being: Schedule 32, target attribute states, monitoring, modelling, objectives, policies and rules2.	Amend to address matters raised in Section A of Wellington Water's submission regarding prioritisation methodologies and implementation. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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S151.158	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Generally supports Schedule 32, including: • the provision for the sub-catchment plans to be developed and implemented over time. • the requirement to provide a methodology for prioritisation in the WNCIS, rather than the actual prioritisation having to be specified in the Strategy at the time consent is sought. Notes the requirements in rules WH.R14 and P.R13 for the WNCIS to be lodged with a resource consent application does not allow room for details to be added, once the consent has been granted. Considers that the level of detail required in Schedule 32 is difficult to achieve, and requirements for more specific details should be left to the Sub-catchment Improvement Plans. Supports the intent for individual sub-catchments to be able to set more or less ambitious containment standards but considers this should be decided after consent has been granted through the sub-catchment improvement plans and flexibility should be given to the consent holder to decide at a later date the exact methods and programme of works required to meet the overall outcome described in the Schedule. Considers Schedule 32 should reference a 35 year timeframe for achieving the containment standard(s). Does not support using volume as a metric and suggests the modelling the frequency of wastewater discharges is more appropriate. Considers the schedule should provide for dry weather discharges (such as dry weather overflows and exfiltration) to be managed via a 'responsive management approach' rather than with reference to the TAS. This is because of the current inability to forecast dry weather overflows or assess the	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				correlation between dry weather discharges within the control of Wellington Water and TAS being achieved	
S151.159	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Considers the level of detail required is difficult to achieve given that this needs to be lodged with the consent application and that the reference to WH.R15 should be replaced by WH.R14	Reduce the level of detail required for the strategy and require it in the subcatchment reduction plans. Refer to WH.R14 and P.R13 rather than WH.R15 and P.R14. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.160	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Considers clause 1 is too broad and will be impossible to satisfy. Notes that the policies make it clear that the focus for wet weather overflows is the containment standard, for which clause 2 is sufficient, and suggests clause 1 can be repurposed to focus on dry weather discharges.	Amend clause 1 as follows: ~~manages the wastewater network catchment in accordance with the relevant objectives and policies of the Plan,~~ **provides a strategic and integrated management plan for reducing the frequency of dry weather discharges,** and Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.161	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Considers clause 2 should refer to wet weather overflows meeting the containment standard, not all wastewater overflows (which includes dry weather).	Limit to wet weather overflows. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.162	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Clause 3: Seeks a rewrite to make it clear that management of the wastewater network is a contributing factor to the TAS rather than the only factor. Seeks the addition of new clause for f e. coli: blockages within the network	Amend clause 3 as follows: provides a strategy for how **to progress towards achieving** target attribute states for Escherichia coli and coastal objectives for enterococci ~~will be achieved,~~ including through reducing inflow, infiltration (groundwater into wastewater pipes), **blockages** and exfiltration (wastewater leakage), and Other relief as may be required to address the issues

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					identified, including relief that is alternative, additional or consequential.
S151.163	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Clause 4: Considers the clause requires something on the relevance of policy directions in the NRP. This does not sit easily with WH.P19(b) which outlines what has to be prioritised. Suggests 'frequency' is more technically appropriate than 'number and volume'. Seeks the deletion of reference to the community as Wellington Water is resolving this in other ways.	Amend clause 4 as follows: identifies the methodology, **with reference to the prioritisation matters contained in Policy WH.P19(b) and Policy P.P18(b),** including engagement with mana whenua ~~and the community,~~ to prioritise wastewater network sub-catchments and/or waterbodies for implementation actions and/or mitigation measures in order to reduce the **frequency** ~~number and volume~~ of wet weather overflows and dry weather discharges, to improve water quality, and Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.164	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Oppose	Clause 5: Considers the requirement for a programme for increasing repairs and renewals is too onerous on top of other work programmes and risks placing the focus in the wrong work area.	Delete clause 5. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.165	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Clause 6: Suggests this should refer to overflows rather than failures	Amend clause 6 as follows: reduces pipe ~~failures~~ **overflows** as a result of blockages within the network or due to aging infrastructure, and Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.166	12 Schedules	Schedule 32: Wastewater Network Catchment Improvem	Amend	Clause 7: Considers the reduced role of Wellington Water for nutrients should be reflected in the wording of this clause.	Amend clause 7 as follows:**describes how it will** supports **working towards** achieving the target attribute states for nitrate, ammonia, phosphorus, dissolved inorganic nitrogen (DIN) and dissolved reactive phosphorus (DRP), and Other relief as may be required to address the issues

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		ent Strategy.			identified, including relief that is alternative, additional or consequential.
S151.167	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Considers the reference to managing in accordance with the objectives in the Wastewater Network Catchment management objective (a) would invite judgment, considers this requirement in the schedule should be reframed as an information requirement	Amend wastewater network objective (a) as follows: identify the relevant water quality objectives, target attribute states, and coastal objectives in this Plan that the wastewater network catchment strategy will respond to ~~is to be managed in accordance with,~~ Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.168	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Oppose	Considers Wastewater Network Catchment management objective (b) is too onerous given the highly variable nature of wastewater discharges and will provide very little, if any, benefit	Delete clause (b). Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.169	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	For Wastewater Network Catchment management objective (c), confirmation of the meaning of 'commensurate' is required. Refers to comments on this term in Section A of submission.	Amend wastewater network objective (c) as follows:**describe the approach to determining (through sub-catchment improvement plans)** ~~identify the strategy to progress towards reduction reducing in~~ the reductions in Escherichia coli **to be achieved in order to contribute to** ~~needed commensurate with that required in the receiving environment to meet~~ **meeting** the target attribute state for Escherichia coli for the affected part Freshwater Management Unit **in the receiving environment,** and Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.170	12 Schedules	Schedule 32: Wastewater Network Catchment Improvem	Amend	Wastewater Network Catchment management objective (d): Supports the intention for individual sub-catchments to be able to set more or less ambitious containment standards but this should be decided after consent has been granted though the sub-	Amend clause (d) as follows: (d) identify **the methodology for determining (in sub-catchment improvement plans)** the current and target containment standard for each wastewater network sub-catchment for each waterbody or sub-catchment, based on

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		ent Strategy.		catchment improvement plans. Suggests that this clause could usefully provide guidance in terms of how the containment standard(s) are to be set, and seeks wording consistent with the approach that has been taken in its applications to date.	data from a network model, **which may include consideration of: network performance, the high level costs and feasibility of achieving different containment standards, and the effects on the environment of the network performing in accordance with different containment standards (including contribution to achieving target attribute states),** and Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.171	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Receiving water body catchment characteristics (g)(iii): Considers 'annual mean overflow volume' and 'number' are not the key variables, frequency is the key variable.	Amend (g)(iii) as follows: the ~~annual mean overflow volume, the number and/or~~ frequency of wet weather overflows to a wastewater network sub-catchment or waterbody, and Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.172	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Strategic actions (i): Considers 'frequency' is a more appropriate metric to 'the number of'.	Amend strategic actions clause (i) as follows: Describe the actions to be taken to reduce the ~~number~~ **frequency** of wet weather overflows through time to meet the objectives of the Plan and the containment standard , and Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.173	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Strategic actions (j): Considers the clause needs to reflect that Wellington Water's dry weather discharges are not the only source of E coli.	Amend strategic actions clause (j) as follows: Describe the ~~actions~~ **responsive management approach** to be ~~taken~~ **applied** to reduce dry weather discharges through time, in order ~~for~~ **to support** the target attribute states for Escherichia coli and coastal objectives for enterococci ~~to be~~ **being** met, and Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S151.174	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Strategic actions (k): Seeks the deletion of reference to receiving environment monitoring as this will not be undertaken by the applicant.	Amend strategic actions clause (k) as follows: Describe the mātauranga monitoring, ~~receiving environment monitoring,~~ frequency of wet weather overflows monitoring, and monitoring to be undertaken to support the modelling, and Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.175	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Strategic actions (m): Considers referencing any activity as illegal is unusual in an RMA document and unnecessary so should be deleted. Considers listing locations is prioritisation is unhelpful given the scale of work that needs to be completed, the potential lack of alignment between these locations and Wellington Water's other activities and the lack of connectivity between these locations and other priorities in the Plan. Refers to Section A of submission for more detail.	Amend strategic actions clause (m) as follows: Describe the programme to investigate and reduce the number of ~~illegal~~ cross-connections **in the public network,** ~~and in Whaitua Te Whanganui a Tara, prioritise audits for Kaiwharawhara Stream, Korokoro Stream, Wainuiomata River and Black Creek,~~ and Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.176	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Oppose	Reporting of the Wastewater Network Catchment Improvement Strategy (s): Considers this should be deleted as this is a Greater Wellington responsibility and impossible for the applicant to implement without a Freshwater Management Tool	Delete clause (s). Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.177	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Subcatchment Improvement Plans: Supports the general approach towards subcatchment improvement plans, particularly that they can be developed and implemented over time. Considers dry weather discharges need to be managed so that they are reduced to contribute to meeting the standards, rather than being responsible for meeting the standards, and that schedule 32 should provide for dry weather	Amend Subcatchment Improvement Plans chapeau as follows: Sub-catchment Improvement Plans shall be prepared and implemented for each of the sub-catchments that make up the wastewater network catchment, or smaller geographical areas. They will be produced over time based on the prioritisation of sub-catchments and will set out how **the frequency of:**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				discharges to be managed via a 'responsive management approach'. Suggests an altered chapeau paragraph structure would make it easier to read.	**(i)** wet weather overflows will be reduced in sub-catchments or areas to meet the containment standard and**/or** **(ii)** dry weather discharges will be **reduced in accordance with a responsive management approach** ~~reduced in order for the target attribute states or coastal objectives to be met~~ Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.178	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Review of the Wastewater Network Catchment Improvement Strategy: Questions whether the maximum review timeframe of once every ten years correct, or whether it is intended to be a minimum. Considers this should refer to actions to 'support' rather than actions to 'meet' the TAS. Considers the reviews should also be able to build on environmental water quality modelling undertaken by GW.	Amend the Wastewater Networks Catchment Improvement Strategy chapeau as follows: The intention of the Wastewater Network Catchment Improvement Strategy is that it will be adaptive as updated catchment characteristics, monitoring data, and information and technology become available. The strategy shall be reviewed and certified by Greater Wellington on a regular basis and no more than once every 10 years. The actions needed to ~~meet~~ **support** the target attribute states will be defined as far as practicable in the first iteration of the strategy and refined through regular reviews. The reviews will be guided by the modelling and monitoring undertaken by the consent holder, and monitoring **and modelling** undertaken by the Wellington Regional Council ~~in accordance with the National Policy Statement for Freshwater Management 2020.~~ Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.179	General comments	General comments - stormwater management	Amend	Considers rules R93 and R120 should be added to the list of provision that will no longer apply to Whaitua Te Whanganui-a-Tara or Te Awarua-o-Porirua Whaitua, as if they continued to apply, it would undermine the more permissive activity status proposed in PC1.	Insert 'Rule R93: All other discharges to sites of significance' and 'Rule R120: Activities in outstanding natural wetlands' to the list of provisions that will no longer apply to Whaitua Te Whanganui-a-Tara or Te Awarua-o-Porirua Whaitua. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

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S151.180	General comments	General comments - definitions	Amend	Notes the term "point source discharges" is used in a number of provisions that will continue to apply within the two whaitua, and seeks confirmation that wastewater and stormwater discharges are not intended to fall within this definition.	Define "point source discharge" so that it clearly excludes discharges from wastewater and stormwater networks. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.181	General comments	General comments - definitions	Amend	Suggests it may be necessary to revisit the existing definition of 'new wastewater discharge' as it will apply differently within the two whaitua given the different definition of 'existing wastewater discharge' that will apply within those areas.	Any amendments as necessary to reflect the corresponding definition of 'existing wastewater discharge', including as it may be modified through the plan change process. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.182	General comments	General comments - definitions	Amend	Submitter has opposed wording to require reductions in contaminants 'commensurate with what is required in the receiving environment' to meet TAS. If relief is not accepted submitter seeks that "commensurate" is defined in PC1.	Add new definition as follows:**Commensurate** **In the context of reductions in contaminants in wastewater or stormwater discharges, means a level of reduction that is both proportionate to the effect of the discharge on the receiving environment, and reasonably within the control of the applicant.** Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.183	General comments	General comments - overall	Amend	Considers more specific objective and policy support is required in PC1 to ensure that the NRP gives effect to aspects of national and regional policy direction, and for consistency with Objective O10 of the NRP, specifically in relation to wastewater infrastructure. Considers policies should recognise that robust, cost-effective, and efficient wastewater and stormwater networks are essential to human health, human safety and social and cultural well-being. Refers to comments in Section A of submission.	Amend existing objective O9 as follows: The social, economic, cultural and environmental benefits of Regionally Significant Infrastructure, renewable energy generation activities and the utilisation of mineral resources are recognized **and provided for.** Reinstate and alter existing O6 as follows: The social, economic, cultural and environmental benefits of: Taking and using water ~~are recognized~~**managing stormwater for the safety of people and property disposing of wastewater to achieve public health outcomes** **are recognized and provided for** when managing water. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S151.184	General comments	General comments - wastewater	Amend	Concerned the PC1 policies and rules are not sufficiently enabling, and in some instances are not feasible to implement.	Amend policies and rules to: Cleanly provide for stormwater and wastewater discharges from local authority networks as a restricted discretionary activity, without this status being jeopardised by subjective assessments of the merits of the SMS or WNCIS, or non-complying activity rules in other parts of the NRP. Provide guidance on the matters to be considered in prioritising sub-catchments for improvement works, while also ensuring sufficient flexibility to take account of practical matters such as investment availability and efficiencies and alignment with other workstreams (including wastewater improvement works). Allow matters of detail to be specified in sub-catchment SMPs and SIPs, rather than in the initial SMS and WNCIS. Provide flexibility for determining the load reductions required in order to appropriately contribute to meeting the TAS (in light of our present concerns with the TAS, lack of information as to baseline states in many cases, and the uncertainty around the 'commensurate reduction' wording and whether this is realistic (i.e. properly within Wellington Water's control) for all attributes). Provide for dry weather discharges (such as dry weather overflows and exfiltration) to be managed via a 'responsive management approach' rather than with reference to the TAS (due to the current inability to forecast dry weather overflows or assess the correlation between dry weather discharges within the control of Wellington Water and TAS being achieved). Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.185	General comments	General comments -	Amend	Supports a restricted discretionary activity status and the preclusion of public notification for stormwater and wastewater discharges from the	Amend rules for stormwater and wastewater discharges from the local authority networks (and/or the associated Schedules) so that they refer to objective information

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		wastewater		local authority networks. However, concerned with the current drafting of the rules which may undermine the Restricted Discretionary status and create uncertainty due to a pre-requisite or 'condition' requiring the activity be accompanied by a strategy prepared 'in accordance with' (as relevant) Schedules 31 or 32. Considers this framing and the subjective wording could invite debate as to whether the relevant strategy is 'in accordance' with them and whether Restricted Discretionary status applies. Also considers this approach is too uncertain for the activity status, and duplicates the substantive assessment of the applications Notes there are further rules in the NRP that should not apply to discharges (e.g. R93 and R120) from the local authority networks and that operative rules such as those relating to sites of significance and wetlands, and the National Environmental Standard for Freshwater, would continue to apply to any stormwater or wastewater discharge from the network. Considers these other less specific rules would undermine the restricted discretionary activity status proposed in PC1 for network discharges. Considers this cannot have been intended, noting the effects on sites of significance being included within the matters of discretion under the new restricted discretionary rules suggests this.	requirements rather than inviting a detailed assessment against the schedules to determine activity status; and All amendments necessary (including disapplying rules in other parts of the NRP) to ensure that the wastewater and stormwater from local authority networks remain a restricted discretionary activity, and the associated rules in PC1 function as a 'one stop shop' in the relevant whaitua. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.186	General comments	General comments - wastewater	Amend	Supports the recognition of the role of modelling in PC1 as an analytical tool, including to assess the performance of the wastewater and stormwater networks and compliance with associated consent requirements.	PC1 be amended to remove unnecessary modelling requirements which are currently to be undertaken by the consent holder; Greater Wellington be responsible for all state of the environment modelling; and Reference to modelling 'concentrations' are removed.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers PC1 will require Wellington Water to undertake significantly more modelling than it already does which in some cases will be onerous with no additional benefit in predicting load reductions or E. coli reductions. Notes Schedule 32 appears to require the full wastewater network to be modelled as part of preparing the WNCIS but considers this will not improve the understanding of overflows beyond that provided by the current 'Strategic Model'. Concerned requiring SMS be guided by modelling and monitoring will place an unreasonably high burden on consent holders. Considers that any receiving environment modelling should be undertaken by Greater Wellington, including state of the environment modelling which is required to ascertain the baseline state for identified attributes. Notes PC1 repeatedly refers to modelling of load as well as concentration of contaminants (WH.P19 and P.P18)but concentration cannot be easily or accurately modelled, and would not provide valuable insight. Considers the focus should be on modelling and managing contaminant load, not concentrations. Notes Wellington Water can undertake modelling for contaminant loads and is looking into models such as the 'Contaminant Load Model' (CLM) and 'Medusa' for that purpose, but ascertaining the load reductions necessary to achieve (or contribute to achieving) the TAS will also require the use of receiving environment models such as the 'Fresh Water Management Tool' (FWMT), which is a project that should be undertaken by Greater Wellington. Notes Wellington Water is also not able to model E. coli or enterococci concentrations or load, and	Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				instead must use the wet weather discharge frequency as a proxy for this.	
S151.187	General comments	General comments - wastewater	Amend	Supports a partnership between Greater Wellington and consent holders for monitoring stormwater and wastewater discharge effects but considers more definition is required about was each party is responsible for. Submitter is implementing a monitoring plan under their Stage 1 Global Stormwater consent to develop a baseline of information on effects of discharges from the network on receiving environments. The monitoring plan will then be revised to provide an integrated receiving environment approach for the network discharges. It is expected that any broader state of the environment monitoring will be undertaken by GWRC and this is the most appropriate approach to monitoring which should be reflected in PC1. Concerned that the PC1 provisions may envisage or require more monitoring to inform the wastewater and stormwater modelling than is actually necessary (or may be necessary in future).	Amend PC1 to: -Clearly indicate what monitoring consent holders are responsible for; and -Clarify that Greater Wellington is responsible for all state of the environment monitoring. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.188	General comments	General comments - wastewater	Amend	Considers provisions in PC1 to manage contaminants discharged to groundwater are inconsistent and unclear and place too much focus on stormwater. For example: -Policy WH.P7 discharges to groundwater is a holistic policy, however it is not carried through to all relevant activities. -Rule R48 Stormwater from individual property - does not mention any effects on groundwater. -Rule WH.R3 Stormwater from individual property - does not mention any effects on groundwater. -Rule WH.R4 Stormwater from existing high risk premise - limits the effects on groundwater to potable water or stock water.	Seeks greater clarity of the approach to managing groundwater, including increased focus on recognised and accepted effects from activities, rather than just activities. Alternatively, discharges of contaminants from the stormwater and wastewater network (other than from a Wastewater Treatment Plant (WWTP)) should be managed by capping, minimising and reducing loads so they do not increase over time and where TAS are exceeded, the reduction is to the extent reasonably practicable. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				-Rule R51 Stormwater to land permitted - limits the effects on groundwater to potable water or stock water. -Rule WH.R2 Stormwater to land - limits the effects on groundwater to potable water or stock water. -s5.1.13 general conditions - there is no mention of discharge to groundwater. -Policy P73 Farm plans - no mention of minimising contamination of groundwater even though farming is a known major contributor in many areas of Aotearoa New Zealand. -Rule R54 Stormwater from ports - does not include discharge to groundwater. -Schedule 31 - Local authorities need to address effects on groundwater as part of the SMS. Policy WH.P21 and P22 refer to "capping, minimising and reducing", not increasing over time and where TAS are exceeded reductions are "to the extent reasonably practicable". This is very different to the expectations for stormwater and wastewater from local authority networks	

S180 William Gill

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S180.001	General comments	General comments - consultation	Not Stated	Concerned about the lack of consultation with affected property owners.	Not stated
S180.002	General comments	General comments - rural	Not Stated	Expresses concern that PC1 will result in the loss of the majority of their farm, due to high-risk erosion provisions; lower slopes provisions; SNAs; forestry activities; and land retirement requirements.	Not stated

S021 William Studd

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S21.001	5.2 and 5.3 Discharges to land and water and land use rules	Rule R104: Vegetation clearance on erosion prone land - permitted activity.	Amend	Supports the submission from NZFFA. More scientific evidence and detailed expert consideration is required before amending the current NES-CF plan.	Not stated

S204 Willowbank Trustee Limited

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S204.001	General comments	General comments - overall	Amend	The submitter generally supports the intent of the amendments in PC1 but does have concerns that PC1 does not acknowledge the importance of rural and primary agriculture activities. Submitter also opposes parts of PC1 as it does not: (a) promote sustainable management of physical resources, including enabling people and communities (including the greater Wellington farming community), to provide for their health and safety, and their social, economic and cultural well-being; (b) promote the efficient use and development of physical resources; (c) ensure consistency with good resource management practise; or (d) adequately manage adverse effects on the environment.	Willowbank requests amendments to PC1 to give effect to the concerns raised in this submission.
S204.002	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of	Amend	Land and soil qualities restrict ability to establish woody vegetation	Amend Policy P.P2 (g) to either delete ~~"with woody vegetation"~~ or revise to include: "with woody vegetation where practicable to do so".

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		activities to achieve target attribute states and coastal water objectives.			
S204.003	9 Te Awarua-o-Porirua Whaitua	Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Support	Supports management practices to minimise diffuse discharges into waterways, reduce erosion and exclude stock from water bodies.	Seeks clarification on how diffuse discharges will be measured at an individual property level.
S204.004	9 Te Awarua-o-Porirua Whaitua	Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Amend	It is not always possible to establish woody vegetation on pasture due to differing land qualities such as soil type, soil depth, and exposed ridgelines. Policy P.P22(c)(i) should focus on addressing erosion risk in an achievable and appropriate manner, which may lead to site-specific solutions, rather than requiring a "one size fits all" approach. As a consequence, Willowbank also seeks: (i) Amendment to Policy P.P2(g) to either delete "with woody vegetation" or revising to include: "with woody vegetation where practicable to do so". (ii) Amendment to Policy P.P20.3 by including "where practicable" after "woody vegetation". (iii) Amendment to Schedule 33: C1(c)(v) by including "where practicable" after "woody vegetation". (iv) Amendment to Schedule 36: E.1 by	Amendment to Policy P.P20.3 by including "where practicable" after "woody vegetation".

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				incorporating a "reasonably practicable" element to the establishment of permanent woody vegetation.	
S204.005	9 Te Awarua-o-Porirua Whaitua	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Amend	Lack of clarity around poor management practices and how they are determined which creates uncertainty for farm owners.	Amend Policy P.P21(c)(ii) by deleting words ~~"and by the phasing out of any poor management practices"~~
S204.006	9 Te Awarua-o-Porirua Whaitua	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	It is not always possible to establish woody vegetation on pasture due to differing land qualities such as soil type, soil depth, and exposed ridgelines. Policy P.P22(c)(i) should focus on addressing erosion risk in an achievable and appropriate manner, which may lead to site-specific solutions, rather than requiring a "one size fits all" approach.	Amend Policy P.P21(c)(i) by deleting words: ~~permanent woody vegetation cover of at least 50% of any erosion risk land (pasture) that is in pasture on a farm within 10 years, and ...~~
S204.007	9 Te Awarua-o-Porirua Whaitua	Rule P.R28: Change of rural land use - discretionary activity.	Oppose	Threshold of land subject to change increased to 20ha to provide more flexibility. Change of rural land should be a restricted discretionary activity as effects can be easily identified in NRP.	Amend Rule P.R28 to be consistent with Policy P.P24 by restricting discretion to the discharge of nitrogen, phosphorous, sediment or Escherichia coli into waterways
S204.008	12 Schedules	C1 Contents of the	Not Stated	It is not always possible to establish woody vegetation on pasture due to differing land qualities such as soil type, soil depth, and exposed	Amend Schedule 33: C1(c)(v) by including "where practicable" after "woody vegetation".

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Erosion and Sediment Management Plan		ridgelines. Policy P.P22(c)(i) should focus on addressing erosion risk in an achievable and appropriate manner, which may lead to site-specific solutions, rather than requiring a "one size fits all" approach. As a consequence, Willowbank also seeks: (i) Amendment to Policy P.P2(g) to either delete "with woody vegetation" or revising to include: "with woody vegetation where practicable to do so". (ii) Amendment to Policy P.P20.3 by including "where practicable" after "woody vegetation". (iii) Amendment to Schedule 33: C1(c)(v) by including "where practicable" after "woody vegetation". (iv) Amendment to Schedule 36: E.1 by incorporating a "reasonably practicable" element to the establishment of permanent woody vegetation.	
S204.009	12 Schedules	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Oppose	Opposes Farm Environment Plan requirements due to significant costs imposed	Not Stated
S204.010	12 Schedules	Schedule 36: Additional requirements for	Amend	It is not always possible to establish woody vegetation on pasture due to differing land qualities such as soil type, soil depth, and exposed ridgelines. Policy P.P22(c)(i) should focus on addressing erosion risk in an achievable	Amend Schedule 36: E.1 by incorporating a "reasonably practicable" element to the establishment of permanent woody vegetation.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.		and appropriate manner, which may lead to site-specific solutions, rather than requiring a "one size fits all" approach. As a consequence, Willowbank also seeks: (i) Amendment to Policy P.P2(g) to either delete "with woody vegetation" or revising to include: "with woody vegetation where practicable to do so". (ii) Amendment to Policy P.P20.3 by including "where practicable" after "woody vegetation". (iii) Amendment to Schedule 33: C1(c)(v) by including "where practicable" after "woody vegetation". (iv) Amendment to Schedule 36: E.1 by incorporating a "reasonably practicable" element to the establishment of permanent woody vegetation.	
S204.011	12 Schedules	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Oppose	Opposes the requirement that highest risk erosion land be revegetated up to 50% by December 2033 due to practicalities identifying non-contiguous erosion areas and non-risk fenced off areas as well as difficulties establishing vegetation and whether the "one rule solution" achieves the outcomes sought.	Not Stated

S206 Winstone Aggregates

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S206.001	General comments	General comments - unplanned greenfield development	Amend	Notes that there is no definition for "greenfield development". Based on the s32 evaluation, considers "greenfield development" to be principally focused on urban development. Concerned the lack of a definition means that all activities may be considered "greenfield development". Seeks the provision of a definition which excludes activities that are not greenfield development, including quarrying activities.	Insert new definition of "greenfield development" as follows: **Greenfield development** **Means any urban development undertaken within a site or sites that has not previously been used for urban land use.** **Greenfield development does not include:** **Quarrying activities.** Request that "quarrying activities" be noted as a defined term.
S206.002	General comments	General comments - urban development	Amend	Seeks the provision of a definition for "urban development", noting that the operative RPS definition can be used.	Insert new definition of "urban development" as follows: **Urban development** **Urban development is subdivision, use and development that is characterised by its planned reliance on reticulated services (such as water supply and drainage) by its generation of traffic, and would include activities (such as manufacturing), which are usually provided for in urban areas. It also typically has lots sizes of less than 3000 square metres.**
S206.003	General comments	General comments - definitions	Amend	Suggests the provision of a definition for "quarrying activities", derived from the NZ Planning Standards.	Insert new definition of "quarrying activities" as follows: **Quarrying activities** **Has the same meaning as in the National Planning Standards (as set out below):** **means the extraction, processing (including crushing, screening, washing, and blending), transport, storage, sale and recycling of aggregates (clay, silt, rock, sand), the deposition of overburden material, rehabilitation, landscaping and cleanfilling of the quarry, and the use of land and accessory buildings for offices, workshops and car parking areas associated with the operation of the quarry.**
S206.004	General comments	General comments - definitions	Amend	Seeks the provision of a definition for "significant mineral resources", derived from the operative RPS. Notes Method 52 of the operative RPS, which requires significant mineral resources to be spatially	Insert new definition of "significant mineral resources" as follows: **Significant mineral resources** **Has the same meaning as in the Wellington Regional**

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				identified. Seeks for this to be undertaken concurrently with PC1 and for the definition to reference the associated mapping.	**Policy Statement (as set out below):** **Deposits of minerals, the extraction of which is of potential importance in order to meet the current or future mineral needs of the region or nation.**
S206.005	General comments	General comments - definitions	Amend	Seeks the provision of a definition for "quarry", derived from the NZ Planning Standards.	Include definition of "quarry": **Quarry** **Has the same meaning as in the National Planning Standards (as set out below):** **means a location or area used for the permanent removal and extraction of aggregates (clay, silt, rock or sand). It includes the area of aggregate resource and surrounding land associated with the operation of a quarry and which is used for quarrying activities.**
S206.006	General comments	General comments - definitions	Amend	Notes there is no definition for "aquatic offset", though notes the NRP currently has definitions for "biodiversity offset" and "offset". Concerned that "biodiversity offset" may be inappropriately applied without a definition for "aquatic offset". Notes the NPS-FM includes a definition for "aquatic offset", and that it would be inconsistent with the NPS-FM to omit the definition from PC1. Seeks for the NPS-FM definition to be inserted, noting that further amendments to provisions may be required to reference the term.	Insert new definition of "aquatic offset" as follows: **Aquatic offset** **Has the same meaning as in the National Policy Statement for Freshwater Management (as set out below):** **means a measurable conservation outcome resulting from actions that are intended to:** **(b) redress any more than minor residual adverse effects on a wetland or river after all appropriate avoidance, minimisation, and remediation, measures have been sequentially applied; and** **(c) achieve no net loss, and preferably a net gain, in the extent and values of the wetland or river, where:** **(i) no net loss means that the measurable positive effects of actions match any loss of extent or values over space and time, taking into account the type and location of the wetland or river; and** **(ii) net gain means that the measurable positive effects of actions exceed the point of no net loss**
S206.007	General comments	General comments - definitions	Amend	Notes there is no definition for "aquatic compensation", though notes the NRP currently has a definition for "biodiversity compensation". Concerned that "biodiversity compensation" may be inappropriately applied without a definition for "aquatic compensation". Notes the NPS-FM	Insert new definition of "aquatic compensation" as follows: **Aquatic compensation** **Has the same meaning as in the National Policy Statement for Freshwater Management (as set out below):** **means a conservation outcome resulting from actions**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				includes a definition for "aquatic compensation", and that it would be inconsistent with the NPS-FM to omit the definition from PC1. Seeks for the NPS-FM definition to be inserted, noting that further amendments to provisions may be required to reference the term	**that are intended to compensate for any more than minor residual adverse effects on a wetland or river after all appropriate avoidance, minimisation, remediation, and aquatic offset measures have been sequentially applied**
S206.008	General comments	General comments - stormwater management	Amend	Seeks the insertion of a specific policy relating to stormwater discharges from a quarry, to ensure clear direction that the rule aligns with.	Insert new Policy WH.P12A as follows (or wording to similar effect): **Policy WH.P12A: Stormwater discharges from quarrying activities** **Provide for the discharge of stormwater, including where it is associated with new or redevelopment of impervious surfaces from a quarry, where:** **(a)The quarry is a significant mineral resource; and** **(b)The quarry is implementing good management practice including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including containment, treatment, management procedures, and monitoring; and** **(c)The discharge does not result in an inability to meet any target attribute state in Table 8.4.**
S206.009	General comments	General comments - stormwater management	Oppose	Notes quarrying activities are considered "high risk industrial or trade premise" under the current rule framework, therefore subject to Rules WH.R4, WH.R11 and WH.R12. Opposes this framework due to consenting implications and limited consenting paths. Considers reasonable activities would require consent under the drafted provisions, despite their scale or whether they have associated discharges. Notes operational stormwater discharges from Winstone's Belmont site would require consent as a non-complying activity. Notes there is no consideration for quarrying activities in the s32 evaluation and it is therefore unclear if the framework is intended to be applied as such. Considers the current approach is inconsistent with the RPS, which recognises the benefits of mineral resources and seeks to enable its ongoing use. The	Insert new Rule WH.R4A as follows (or wording to similar effect): **Rule WH.R4A: Stormwater from quarrying activities - permitted activity** **The discharge of stormwater from a quarrying activity into water, or onto or into land where it may enter a surface water body or coastal water, including where it is associated with the use of land for the creation of new, or redevelopment of existing impervious surfaces, is a permitted activity, provided the following conditions are met:** **(a) The quarrying activity is of significant mineral resource; and** **(b) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and** **(c) the discharge does not contain wastewater, and**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				submitter notes amendments they seek for the RPS, which are relied on for PC1. Seeks the insertion of two rules relating to quarrying activities associated with significant mineral resources, being a permitted activity rule applying to all stormwater discharges; and a restricted discretionary activity rule where the permitted activity rule is not met, subject to stormwater discharges meeting the relevant target attribute states. Notes a similar approach in Rules WH.R8, WH.R9 and WH.R10 for airports and roading.	**(d) if the discharge is to land where it may enter groundwater,** **(i) the discharge cannot cause or exacerbate the flooding of any other property, and** **(ii) the discharge is not located within 20m of a bore used for water abstraction for potable supply or stock water, and** **(e) if the discharge is into a surface water body or into coastal water the concentration of total suspended solids in the discharge shall not exceed:** **(i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or** **(ii) 100g/m3 where the discharge enters any other water,** **(f) the discharge shall also not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and** **(g) the discharge shall also not give rise to the following effects beyond the zone of reasonable mixing:** **(i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or** **(ii) any conspicuous change in the colour, or** **(iii) a decrease in water clarity of more than** **1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or** **2. 30% in any other river, or** **(iv) any emission of objectionable odour, or** **(v) the freshwater is unsuitable for consumption by farm animals, or** **(vi) any significant adverse effects on aquatic life.**
S206.010	General comments	General comments - stormwate	Oppose	Notes quarrying activities are considered "high risk industrial or trade premise" under the current rule framework, therefore subject to Rules WH.R4, WH.R11 and WH.R12. Opposes this framework due	Insert new Rule WH.R8A as follows (or wording to similar effect): **Rule WH.R8A: Stormwater from a quarrying activity - restricted discretionary activity The discharge of**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		r managem ent		to consenting implications and limited consenting paths. Considers reasonable activities would require consent under the drafted provisions, despite their scale or whether they have associated discharges. Notes operational stormwater discharges from Winstone's Belmont site would require consent as a non-complying activity. Notes there is no consideration for quarrying activities in the s32 evaluation and it is therefore unclear if the framework is intended to be applied as such. Considers the current approach is inconsistent with the RPS, which recognises the benefits of mineral resources and seeks to enable its ongoing use. The submitter notes amendments they seek for the RPS, which are relied on for PC1. Seeks the insertion of two rules relating to quarrying activities associated with significant mineral resources, being a permitted activity rule applying to all stormwater discharges; and a restricted discretionary activity rule where the permitted activity rule is not met, subject to stormwater discharges meeting the relevant target attribute states. Notes a similar approach in Rules WH.R8, WH.R9 and WH.R10 for airports and roading.	**stormwater from a quarrying activity associated with a significant mineral resource into water, or onto or into land where it may enter a surface water body or coastal water, including where it is associated with the use of land for the creation of new, or redevelopment of existing impervious surfaces, is a restricted discretionary activity where:** **(a) The quarrying activity is of significant mineral resource; and** **(b) Rule WH.R4A cannot be met, and** **(c) the discharge does not result in an inability to meet any target attribute state in Table 8.4 is met for a relevant part Freshwater Management Unit, and** **(d) the discharge does not result in an inability to meet any target attribute state in Table 8.1 is met for a relevant coastal water management unit.** **Matters for discretion** **1. The management of the adverse effects of stormwater capture and discharge, including on aquatic ecosystem health and mahinga kai, contact recreation and Māori customary use** **2. The management of effects on sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (indigenous biodiversity)** **3. Minimisation of the adverse effects of stormwater discharges** **4. Provision for hydrological control measures where discharges will enter a surface water body (including from an existing local authority stormwater network).**
S206.011	General comment s	General comments - stormwate r managem ent	Amend	Seeks the insertion of a specific policy relating to stormwater discharges from a quarry, to ensure clear direction that the rule aligns with.	Insert new Policy WH.P12A as follows: **Policy P.P12A: Stormwater discharges from quarrying activities** **Provide for the discharge of stormwater, including where it is associated with new or redevelopment of impervious surfaces from a quarry, where:** **(a) The quarry is a significant mineral resource; and** **(b) The quarry is implementing good management**

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					practice including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including containment, treatment, management procedures, and monitoring; and (c) The discharge does not result in an inability to meet any target attribute state in Table 8.4.
S206.012	General comments	General comments - stormwater management	Amend	Notes quarrying activities are considered "high risk industrial or trade premise" under the current rule framework, therefore subject to Rules WH.R4, WH.R11 and WH.R12. Opposes this framework due to consenting implications and limited consenting paths. Considers reasonable activities would require consent under the drafted provisions, despite their scale or whether they have associated discharges. Notes operational stormwater discharges from Winstone's Belmont site would require consent as a non-complying activity. Notes there is no consideration for quarrying activities in the s32 evaluation and it is therefore unclear if the framework is intended to be applied as such. Considers the current approach is inconsistent with the RPS, which recognises the benefits of mineral resources and seeks to enable its ongoing use. The submitter notes amendments they seek for the RPS, which are relied on for PC1. Seeks the insertion of two rules relating to quarrying activities associated with significant mineral resources, being a permitted activity rule applying to all stormwater discharges; and a restricted discretionary activity rule where the permitted activity rule is not met, subject to stormwater discharges meeting the relevant target attribute states. Notes a similar approach in Rules WH.R8, WH.R9 and WH.R10 for airports and roading.	Insert new Rule P.R4A as follows: **Rule P.R4A: Stormwater from quarrying activities - permitted activity The discharge of stormwater from a quarrying activity into water, or onto or into land where it may enter a surface water body or coastal water, including where it is associated with the use of land for the creation of new, or redevelopment of existing impervious surfaces, is a permitted activity, provided the following conditions are met: (a) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (b) the discharge does not contain wastewater, and (c) if the discharge is to land where it may enter groundwater, (i) the discharge cannot cause or exacerbate the flooding of any other property, and (ii) the discharge is not located within 20m of a bore used for water abstraction for potable supply or stock water, and (d) if the discharge is into a surface water body or into coastal water the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, (e) the discharge shall also not cause any erosion of the channel or banks of the receiving water body or the**

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					coastal marine area, and **(f) the discharge shall also not give rise to the following effects beyond the zone of reasonable mixing:** **(i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or** **(ii) any conspicuous change in the colour, or** **(iii) a decrease in water clarity of more than** **1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or** **2. 30% in any other river, or** **(iv) any emission of objectionable odour, or** **(v) the freshwater is unsuitable for consumption by farm animals, or** **(vi) any significant adverse effects on aquatic life.**
S206.013	General comments	General comments - stormwater management	Amend	Notes quarrying activities are considered "high risk industrial or trade premise" under the current rule framework, therefore subject to Rules WH.R4, WH.R11 and WH.R12. Opposes this framework due to consenting implications and limited consenting paths. Considers reasonable activities would require consent under the drafted provisions, despite their scale or whether they have associated discharges. Notes operational stormwater discharges from Winstone's Belmont site would require consent as a non-complying activity. Notes there is no consideration for quarrying activities in the s32 evaluation and it is therefore unclear if the framework is intended to be applied as such. Considers the current approach is inconsistent with the RPS, which recognises the benefits of mineral resources and seeks to enable its ongoing use. The submitter notes amendments they seek for the RPS, which are relied on for PC1. Seeks the insertion of two rules relating to quarrying activities associated with significant mineral resources, being a permitted activity rule applying to all stormwater discharges;	Insert new Rule P.R8A as follows: **Rule P.R8A: Stormwater from a quarrying activity - restricted discretionary activity** **The discharge of stormwater from a quarrying activity into water, or onto or into land where it may enter a surface water body or coastal water, including where it is associated with the use of land for the creation of new, or redevelopment of existing impervious surfaces, is a restricted discretionary activity where:** **(a) Rule P.R4A cannot be met, and** **(b) the discharge does not result in an inability to meet any target attribute state in Table 9.4 is met for a relevant part Freshwater Management Unit, and** **(c) the discharge does not result in an inability to meet any target attribute state in Table 9.1 is met for a relevant coastal water management unit.** **Matters for discretion** **(d) The management of the adverse effects of stormwater capture and discharge, including on aquatic ecosystem health and mahinga kai, contact recreation and Māori customary use** **(e) The management of effects on sites identified in**

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				and a restricted discretionary activity rule where the permitted activity rule is not met, subject to stormwater discharges meeting the relevant target attribute states. Notes a similar approach in Rules WH.R8, WH.R9 and WH.R10 for airports and roading.	**Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (indigenous biodiversity)** **(f) Minimisation of the adverse effects of stormwater discharges** **(g) Provision for hydrological control measures where discharges will enter a surface water body (including from an existing local authority stormwater network).**
S206.014	General comments	General comments - overall	~~Not Stated~~ Amend	Considers there is a lack of consideration for quarrying activities through the drafting of the rules and the s32 evaluation. Considers that quarrying activities are not specifically anticipated under either of the rules frameworks introduced in PC1 for rural activities or urban activities. Considers that quarrying activities would be captured under the urban related rules, which would be onerous and would restrict continued operation of local quarries. Considers the current approach inconsistent with the RPS, which directs recognition of the benefits of mineral resources and their ongoing use. Considers the proposed approach inconsistent with national direction that provides for clear consenting pathways for beneficial activities such as quarrying activities, noting the NPS-FM and NES for Freshwater in particular. Also notes the NPS-IB and NPS-HPL provide a pathway for aggregate extraction and supply, which is tied with the implementation of the NPS-UD in providing for the necessary infrastructure to deliver well-functioning urban environments.	Seeks specific consenting pathway for the continuation of regionally significant quarrying activities within the Wellington Region.
S206.015	General comments	General comments - overall	~~Not Stated~~ Oppose	Considers prohibited activity status is not reasonable, based on a wide range of activities that would be captured under the proposed prohibited rules, noting that prohibited activity status is afforded to activities causing significant and unmitigable adverse effect, or that are fundamentally contrary to a planning document. Considers that neither a sufficient evidence base or	~~Not stated~~ Seeks that further consideration is given to the activity statuses proposed and whether proportionate evaluation has been given.

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				evaluation has been provided for the prohibited activity status, or for the consideration of alternative activity statuses to appropriately manage the resource management issue. Further considers the non-complying activity status overused and where the purpose of the RMA and objectives of the plan can be met by a less restrictive regime, that it should be adopted, citing an Environment Court decision. Considers discretionary activity status to generally be more efficient and effective and non-complying activity status as a default where an activity is not otherwise provided for inappropriate, noting that quarrying activities would trigger non-complying activity status for earthworks. Considers the proposed approach inconsistent with national direction that provides for clear consenting pathways for beneficial activities such as quarrying activities, noting the NPS-FM and NES for Freshwater in particular, which provide for a discretionary consenting pathway for quarrying and clean filling activities. Considers non-complying activity status would undermine the ability to implement national direction by bundling resource consent applications into non-complying activity status.	
S206.016	General comments	General comments - definitions	~~Not Stated~~ Amend	Considers the definition for "high risk industrial or trade premises" would include quarrying activities, despite not resulting in discharges of hazardous substances, and therefore subject to Rules WH.R4, WH.R11 and WH.R12. Considers the inclusion of quarrying activities in these rules unreasonable, and would add onerous consenting requirements for low risk activities. Notes examples of small scale activities that would require resource consent despite all stormwater being captured and treated within the site.	Provision of a specific rule framework for quarrying activities, similar to the approach taken for ports and airports, wherein restricted discretionary activity status applies for most discharges anticipated from an operational quarry. Rules to be linked to the TAS for the related Whaitua. Where a discharge would result in TAS not met for the part of the FMU, activity status to fall to non-complying.

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S206.017	General comments	General comments - earthworks	~~Not Stated~~ Oppose	Considers earthworks (excluding earthworks on a farm) will be at least a restricted discretionary activity, regardless of scale or adverse effect. Notes the conjunctive requirement was not intended for all clauses. Seeks an urgent variation is issued to correct the permitted rule. Notwithstanding this correction, opposes the rule framework and associated policy direction that restricts earthworks over winter months, as it does not account for long-term ongoing permanent earthwork activities that occur year-round, such as quarrying activities. Considers insufficient justification is provided in the s32 evaluation for the shut down period, including an assessment of costs and benefits, or direct and indirect effects to quarrying activities. Considers restrictions will increase cost and length of construction periods, and will impact supply of aggregate. Disagrees with the assumption that increased sediment discharges are more likely during winter months, noting that unpredictable rainfall events can occur at any time of year, which will increase with climate change. Further notes that receiving environments are less vulnerable during winter months as water temperatures are lower and flows are higher. Considers non-complying activity status for earthworks not meeting restricted discretionary conditions is onerous, noting that replacement earthworks consents for an operational quarry would be subject to the rule. Considers this does not recognise the importance of local source aggregate and is contrary to the Regional Policy direction. Notes that where non-complying activity status is in practical terms no different than discretionary activity status, then the less onerous activity status is the most appropriate.	Remove the shutdown period over winter months. Amend non-complying activity status to discretionary.
S206.018	General comments	General comments - maps	~~Not Stated~~ Amend	Supports a nuanced approach to high erosion risk land, wherein the PC1 definitions differentiate between vegetation types. However, concerned with	Review mapping, or remove and the current approach relied on until robust mapping is undertaken.

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				the accuracy and quality of the mapping referenced in the definitions.	
S206.019	General comments	General comments - maps	~~Not Stated~~ Amend	Notes there is no definition for "greenfield development", and that the definition for "unplanned greenfield development" simply refers to greenfield development identified in the PC1 maps. Concerned the lack of a definition means any development in the mapped areas is captured as "greenfield development" and the associated rules. Notes conflict between the PC1 maps and district plan maps. Concerned that stormwater discharge from an impervious surface within an operational quarry that is subject to "unplanned greenfield development" would be a prohibited activity, noting that it is not possible to avoid all stormwater discharges within a quarry. Concerned the approach to managing greenfield development seeks to manage land use its itself, rather than an effect. Concerned that general rules for earthworks, and the creation of impervious surfaces, without any associated discharges to water, overlap with the jurisdiction of territorial authorities. Considers there is insufficient evidence in the s32 evaluation to support prohibiting unplanned greenfield development in all circumstances. Questions the efficiency and effectiveness of the proposed approach, noting there is no ability for joint territorial and regional plan change processes to be considered under the RMA. Notes the prohibited rules relates to the coastal marine area, therefore requiring final approval from the Minister for Conservation, and that a district plan change would likely be undertaken after a plan change for the NRP, given that it must not be inconsistent with a regional plan. Concerned with the uncertainty and slowness of the private plan change process, and that resource consent would still be required after a plan change, therefore incurring costs and delays.	Definition of greenfield development (and unplanned greenfield development) is defined to be specific to urban development and does not capture quarrying activities.

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S206.020	General comments	General comments - stormwater management	~~Not Stated~~ Amend	Considers financial contribution provisions inconsistent with the NPS-FM, and limits the ability to implement the effects management hierarchy. Notes that aquatic offsetting or compensation is required by the NPS-FM where there are more than minor residual adverse effects, rather than residual adverse effects generally. Considers a contribution mechanism to address minor/residual effects unlikely to be effective or efficient, and concerned that financial contributions are the only form of offset that may be provided. Considers it contrary to the NPS-FM to not allow consideration for the principles set out in Appendix 6 of the NPS-FM. Notes the provisions limit the management of residual adverse effects to aquatic offsetting only, whereas the effects management hierarchy provides for aquatic compensation where aquatic offsetting is not able to be provided.	Other forms of aquatic offsetting are provided for and aquatic compensation is enabled where aquatic offsetting can not be achieved. Retain financial contribution offsetting as optional.
S206.021	General comments	General comments - stormwater management	~~Not Stated~~ Amend	Acknowledges that rules may apply to stormwater discharges to a surface water body from a stormwater network, however considers it is ultra vires to manage effects before this point, citing case law which holds that the regulation of discharges into water under s15 of the RMA does not apply to discharges into the pipes that form a reticulated system.	Make amendments such that rules only relate to discharges from a stormwater network, rather than into a stormwater network.
S206.022	General comments	General comments - fresh water	~~Not Stated~~ Oppose	Concerned that several provisions are subject to the Freshwater Planning Process (FPP) where freshwater is only a peripheral issue to which the provision relates. Considers this an inappropriate use of the FPP, giving rise to jurisdictional problems such as restricted appeal rights. Considers improper allocation results in delays and costs, and is exacerbated by the restrictive activity statuses proposed.	Review the scope of FPP versus Schedule 1 processes. Only provisions where freshwater is the primary issue to be subject to the FPP; remaining provisions allocated to Schedule 1.
S206.023	2 Interpretation	Earthworks	Oppose	Seeks for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua to include all exemptions provided in the existing definition of earthworks.	Amend definition as follows: For Whaitua Te Whanganui-a-Tara and Te Awarua-o-

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				Notes the use of "and" implies all earthworks exclusions are conjunctive and seeks clarification that the exclusions are disjunctive through the use of "or". Supports clarification provided to exemption clause (i) of the existing definition.	Porirua Whaitua only: The alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); ~~but excludes gardening, cultivation, and disturbance of land for the installation of fence posts.~~**Earthworks do not include:** **(a) cultivation of the soil for the establishment of crops or pasture, or** **(b) the harvesting of crops, or** **(c) thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, or** **(d) the construction, repair, upgrade or maintenance of:** **(i) pipelines, or** **(ii) electricity lines and their support structures, including the National Grid,** **or** **(iii) telecommunication structures or lines, or** **(iv) radio communication structures, or** **(v) firebreaks or fence lines, or** **(vi) a bore or geotechnical investigation bore, or** **(d) repair or maintenance of existing roads and tracks, and airfield runways, taxiways, and parking aprons for aircraft, or** **(e) maintenance of orchards and shelterbelts, or** **(f) domestic gardening, or** **(g) repair, sealing or resealing of a road, footpath, driveway, or** **(h) discharge of cleanfill material to a cleanfill area** Except that, for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20, 'earthworks' has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017. Amend definition as follows: For all other whaitua:

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					The disturbance of a land surface from the time soil is first disturbed on a site until the time the site is stabilised. Earthworks includes blading, contouring, ripping, moving, removing, placing or replacing soil or earth, by excavation, or by cutting or filling operations, or by root raking. Earthworks do not include: (a) cultivation of the soil for the establishment of crops or pasture,~~and~~ **or** (b) the harvesting of crops, and **or** (c) thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance,~~and~~ **or** (d) the construction, repair, upgrade or maintenance of: (vii) pipelines, ~~and~~ **or** (viii) electricity lines and their support structures, including the National Grid, and **or** (ix) telecommunication structures or lines, and **or** (x) radio communication structures, and **or** (xi) firebreaks or fence lines, and **or** (xii) a bore or geotechnical investigation bore, and **or** (e) repair or maintenance of existing roads and tracks, and airfield runways, taxiways, and parking aprons for aircraft, and **or** (f) maintenance of orchards and shelterbelts, and **or** (g) domestic gardening, and **or** (h) repair, sealing or resealing of a road, footpath, driveway, and **or** (i) discharge of cleanfill material to a cleanfill area
S206.024	2 Interpretation	High risk industrial or trade premise	Oppose	Opposes the activities which "may" be captured within the definition of high risk industrial or trade premise, noting some are unlikely to generate industrial or trade waste contaminants, citing "mineral extraction, refining and reprocessing, storage, and use" in relation to quarrying activities in particular. States no evidence is provided to suggest the listed activities are high risk industrial or trade premises and seeks their removal. Concerned that the activities may be predetermined as meeting	Amend definition as follows: High risk industrial or trade premise An industrial or trade premise that stores, uses or generates ~~contaminants or~~ hazardous substances on-site that are exposed to rain and could become entrained in stormwater. ~~Activities that may occur at these premises could include:~~ ~~-boat construction and maintenance~~ ~~-commercial cement, concrete or lime manufacturing or storage~~

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				the definition. Considers the existing definitions for "industrial activity" and "industrial trade waste" under the NZ Planning Standards are sufficiently clear. Opposes the use of the term contaminants as it increases the scope of the definition. Seeks that the definition is limited to the generation of hazardous substances, as defined in the NZ Planning Standards.	~~-chemical manufacture, formulation or bulk storage, recovery, processing or recycling~~ ~~-fertiliser manufacture or bulk storage~~ ~~-storage of hazardous wastes including waste dumps or dam tailings associated with mining activities~~ ~~-petroleum or petrochemical industries including a petroleum depot, terminal blending plant or refinery, or facilities for recovery, reprocessing or recycling petroleum based materials,~~ ~~-scrap yards including automotive dismantling, wrecking or scrap metal yards~~ ~~-wood treatment or preservation, or bulk storage of treated timber~~ ~~-mineral extraction, refining and reprocessing, storage, and use~~ ~~-explosives and ordinances production, storage, and use~~ ~~-electronics including the commercial manufacturing, reconditioning, or recycling of computers, televisions, and other electronic devices~~ ~~-waste recycling, treatment, and disposal~~ ~~-engineering workshops with metal fabrication, or electroplaters power stations, substations, or switchyards.~~
S206.025	2 Interpretation	Highest erosion risk land (plantation forestry)	Oppose	Opposes the mapping associated with the definition. Considers the mapping too high level and unsubstantiated. Seeks for the existing approach (including the existing definition of "erosion prone land") to be retained until a robust vegetation and land stability mapping exercise is undertaken. Opposes the definition as being subject to the Freshwater Planning Process, and considers the definition and associated rules relate to soil conservation rather than freshwater. Considers the approach inconsistent with RPS Proposed Change 1, which is subject to the Schedule 1 Process.	Update mapping with accurate and evidence-based mapping, or delete definition and retain existing NRP definition: **Erosion prone land** **The pre-existing slope of the land exceeds 20 degrees.** Should the definition be retained, seek it be subject to the Part 1 Schedule 1 Process and not the Freshwater Planning Process.
S206.026	2 Interpretation	Highest erosion risk	Oppose	Opposes the mapping associated with the definition. Considers the mapping too high level and unsubstantiated. Seeks for the existing approach (including the existing definition of "erosion prone	Update mapping with accurate and evidence-based mapping, or delete definition and retain existing NRP definition: **Erosion prone land**

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		land (pasture)		land") to be retained until a robust vegetation and land stability mapping exercise is undertaken. Opposes the definition as being subject to the Freshwater Planning Process, and considers the definition and associated rules relate to soil conservation rather than freshwater. Considers the approach inconsistent with RPS Proposed Change 1, which is subject to the Schedule 1 Process.	**The pre-existing slope of the land exceeds 20 degrees.** Should the definition be retained, seek it be subject to the Part 1 Schedule 1 Process and not the Freshwater Planning Process.
S206.027	2 Interpretation	Highest erosion risk land (woody vegetation)	Oppose	Opposes the mapping associated with the definition. Considers the mapping too high level and unsubstantiated, noting that high erosion risk land (woody vegetation) is shown to be within an operational quarry. Seeks for the existing approach (including the existing definition of "erosion prone land") to be retained until a robust vegetation and land stability mapping exercise is undertaken. Opposes the definition as being subject to the Freshwater Planning Process, and considers the definition and associated rules relate to soil conservation rather than freshwater. Considers the approach inconsistent with RPS Proposed Change 1, which is subject to the Schedule 1 Process.	Update mapping with accurate and evidence-based mapping, or delete definition and retain existing NRP definition: **Erosion prone land** **The pre-existing slope of the land exceeds 20 degrees.** Should the definition be retained, seek it be subject to the Part 1 Schedule 1 Process and not the Freshwater Planning Process.
S206.028	2 Interpretation	Impervious surfaces	Amend	Considers the definition will capture a range of surfaces within a quarry. Notes from the s32 evaluation that it is intended for the impervious surface rules to capture urban development, however concerned that they would capture quarrying activities without a reasonable consenting pathway. Seeks for the definition to exclude impervious surfaces associated with quarrying activities.	Amend definition as follows: Impervious surfaces Surfaces that prevent or significantly impede the infiltration of stormwater into soil or the ground, includes: roofs paved areas (including sealed/compacted metal) such as roads, driveways, parking areas, sidewalks/foot paths or patios, and excludes: grassed areas, gardens and other vegetated areas porous or permeable paving slatted decks which allow water to drain through to a permeable surface porous or permeable paving and living roofs roof areas with rainwater collection and reuse

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					any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)**any impervious surface associated with a quarrying activity**
S206.029	2 Interpretation	Unplanned greenfield development	Amend	Seeks amendment in accordance with the submitter's relief sought for the insertion of a definition for "greenfield development". Considers the advice note inappropriate and unnecessary, and seeks its deletion.	Amend definition as follows: Unplanned greenfield development Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 which also require an underlying zone change (from rural/non- urban/open space to urban) though a District Plan change to enable the development.~~Note: Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023.~~
S206.030	5.4 Beds of lakes and rivers	Rule R128: New structures - permitted activity.	Oppose	Considers the proposed change will remove the ability to construct minor structures within the bed of a river without the need for resource consent, noting examples of structures that would be come discretionary activities. Notes the existing rule provides for minor structures (less than 10m2) and considers discretionary activity status for such structures onerous. Considers insufficient explanation is provided for the change in the s32 evaluation.	Changes are rejected and Rule R128 is retained as operative.
S206.031	5.4 Beds of lakes and rivers	Rule R151A: Ongoing diversion of a river - permitted activity.	Support	Supports the rule as it will negate the requirement for long term river diversions where they are permanent.	Retain as notified
S206.032	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies and the	Amend	Supports the long-term vision for Whaitua Te Whanganui-a-Tara, however seeks that restoration of Āhua should only occur where natural character has been degraded, otherwise considers there is an unrealistic requirement on what it is being restored and the baseline state. Considers the requirement for margins of freshwater bodies to be planted will	Amend Objective WH.O1: Objective WH.O1 The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.

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		coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.		not be practicable in all instances, such as where freshwater bodies are piped or of a concrete channel. Seeks amendment to "as far as practicable", noting that all types of waterbodies are captured, and planting may not be possible or desirable for some.	Note In the wai ora state: Āhua (natural character) is restored **where it has been degraded** and freshwater bodies exhibit their natural quality, rhythms, range of flows, form, hydrology and character~~All~~ freshwater bodies have planted margins **as far as practicable** All freshwater bodies and coastal waters have healthy functioning ecosystems and their water conditions and habitat support the presence, abundance, survival and recovery of At-risk and Threatened species and taonga species Mahinga kai and kaimoana species are healthy, plentiful enough for long term harvest and are safe to harvest and eat or use, including for manuhiri and to exercise manaakitanga Mana whenua are able to undertake customary practices at a range of places throughout the catchment.
S206.033	8 Whaitua Te Whanganui-a-Tara	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	Amend	Considers the direction in (b) and (c) to "protect" is inconsistent with NPS-FM Policy 5, which requires freshwater and freshwater ecosystems are "maintained", noting that "protection" is only afforded to outstanding freshwater bodies and habitats of indigenous freshwater species under NPS-FM Policies 8 and 9. Considers protection a higher bar than maintain, potentially leading to perverse outcomes and an inability for reasonable development to occur. Seeks clarification on what "aquifer consolidation" refers to in (f).	Clarify what is "aquifer consolidation", and Amend Objective WH.O6: Objective WH.O6 Groundwater flows and levels, and water quality, are maintained at levels that: (a) ensure base flows or levels in surface water bodies and springs are supported and salt-water intrusion is avoided, and (b) ~~protect~~ **maintain** groundwater dependent ecosystems, and (c) ~~protect~~ **maintain** ecosystems in connected surface water bodies, and (d) ensure that groundwater is of sufficient quality for human and stock drinking water, and (e) ensure there is not a long-term decline in mean annual groundwater levels, including artesian pressures and (f) avoid aquifer consolidation.
S206.034	8 Whaitua Te	Objective WH.O9:	Amend	Concerned over whether the improvements sought are too ambitious and unrealistic in the proposed	Revise the improvement requirements of Table 8.4 or the timeframe to ensure that outcomes can be realistically

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	Whanganui-a-Tara	Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.		timeframe. Considers the requirement to move from the existing D state to B state for periphyton biomass; and from the existing C state to A state for E. Coli will require significant land use change. Considers (c) unrealistic, and that it does not account for seasonal shifts in water quality and ecological condition. Considers there is no certainty for what the expectations are.	achieved; And; Amend Objective WH.O9: Objective WH.O9 Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved by ensuring that: (a) where a target attribute state in Table 8.4 is not met, the state of that attribute is improved in all rivers and river reaches in the part Freshwater Management Unit so that the target attribute state is met within the timeframe indicated within Table 8.4, and (b) where a target attribute state in Table 8.4 is met, the state of that attribute is at least maintained in all rivers within the part Freshwater Management Unit, and~~(c) where any attribute in any river or river reach is in a better state than the target attribute state, that attribute is at least maintained at the better state in every river or river reach, and~~ (d) where a huanga of mahinga kai and Māori customary use for locations identified in Schedule B (Ngā Taonga Nui a Kiwa) and is not achieved, the state of the river or river reach is improved.
S206.035	8 Whaitua Te Whanganui-a-Tara	Policy WH.P1: Improvement of aquatic ecosystem health.	Amend	Considers (a) requires progressive reduction in the load and concentration of contaminants for all water bodies, regardless of whether improvement is required or not. Seeks clarification accordingly. Considers (b) would apply to all habitats, including exotic. Notes the NPS-FM does not require restoration of all habitats, but is rather limited to indigenous wetland habitat, where the habitat is degraded. Seeks clarification accordingly. Considers it unclear what is being coordinated and prioritised in (d), and what "catchments that require changes to land use activities that impact water"	Amend policy as follows: Policy WH.P1: Improvement of aquatic ecosystem health Aquatic ecosystem health will be improved by: (a) progressively reducing the load or concentration of contaminants **where improvement in water quality is required,** particularly sediment, nutrients, pathogens and metals, entering water, and (b) restoring **indigenous habitats that have been degraded,** and (c) enhancing the natural flow regime of rivers and managing water flows and levels, including where there is interaction of flows between surface water and groundwater, and (d) co-ordinating and ~~prioritising~~ **enabling** work programmes

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				means. Considers the clause should refer to enabling work programmes that provide for improvement. Suggests consideration as to whether clause is better suited as a method rather than a policy directive.	in catchments that **seek to improve aquatic ecosystem health** ~~require changes to land use activities that impact on water.~~
S206.036	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Oppose	Considers clause (a) prescribes the activity status of an activity, rather than focusing on an adverse effect. Notes "unplanned greenfield development" may be applied generally, given "greenfield development" is not defined, meaning that development within an area mapped as "unplanned" would be subject to this direction. Considers financial contribution provisions inconsistent with the NPS-FM, and limits the ability to implement the effects management hierarchy. Notes that aquatic offsetting or compensation is required by the NPS-FM where there are more than minor residual adverse effects, rather than residual adverse effects generally. Considers a contribution mechanism to address minor/residual effects unlikely to be effective or efficient, and concerned that financial contributions are the only form of offset that may be provided. Considers it contrary to the NPS-FM to not allow consideration for the principles set out in Appendix 6 of the NPS-FM. Notes the provisions limit the management of residual adverse effects to aquatic offsetting only, whereas the effects management hierarchy provides for aquatic compensation where aquatic offsetting is not able to be provided. Acknowledges financial contributions may be an appropriate form of aquatic offset, however seeks the policy does not frustrate the ability for other forms of aquatic offsetting or aquatic compensation. Supports the direction of clause (e), however notes the planting of riparian margins may not always be practicable.	Amend policy as follows: Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (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~~s~~ as ~~to~~ **an aquatic** offset ~~adverse effects from residual stormwater contaminants,~~ and (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation **where practicable,** and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.

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S206.037	8 Whaitua Te Whanganui-a-Tara	Policy WH.P5: Localised adverse effects of point source discharge.	Amend	Considers the policy implies clauses (a)-(e) must be avoided even within the mixing zone. Considers this is not a realistic requirement, as any discharge can cause at least one of those effects at a localised level. Seeks changes to clarify the policy focus on limiting those effects to the mixing zone, and avoiding significant adverse effects beyond the zone of reasonable mixing.	Amend policy as follows: Policy WH.P5: Localised adverse effects of point source discharge The localised adverse effects of point source discharges to freshwater and coastal water **are as far as practicable retained within** ~~beyond~~ the zone of reasonable mixing. ~~are avoided or minimised~~ **Significant adverse effects beyond the zone of reasonable mixing must be avoided,** including by avoiding **the following effects:** (a) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (b) any conspicuous change in colour or visual clarity, or (c) any emission of objectionable odour, or (d) the rendering of freshwater unsuitable for consumption by farm animals, or (e) any significant adverse effects on aquatic life including through: (i) change in temperature, or (ii) reduced dissolved oxygen in surface water bodies, or (iii) increased toxicity effects.
S206.038	8 Whaitua Te Whanganui-a-Tara	Policy WH.P7: Discharges to groundwater.	Amend	Considers the requirement that all discharges "shall not degrade" is not clear or directly measurable. Considers direction should be focused on "maintaining" groundwater quality based on its use, in accordance with NPS-FM Policy 5. Notes there is no indication on what "degraded groundwater" means, and considers it must be aligned with a limit depending on the use of the groundwater. Seeks the policy is split into two sentences to improve clarity.	Amend policy as follows: Policy WH.P7: Discharges to groundwater All discharges to land that may enter groundwater, and discharges to groundwater, shall maintain ~~not degrade the quality of~~ groundwater **quality to continue to provide for its existing and future use,.** ~~and w~~**W**here the ~~quality of~~ groundwater **quality is not meeting national guidelines** ~~is degraded, existing~~ discharges shall be managed in a way that to improves groundwater quality.
S206.039	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater	Oppose	Considers the policy would apply to stormwater discharges from a quarry, and that the direction is not practicable. Considers the requirements appropriate for urban development, but not appropriate for non-urban activities. Seeks amendment to relate specifically to stormwater discharges from greenfield development, per the	Amend policy as follows: Policy WH.P10: Managing adverse effects of stormwater discharges All stormwater discharges **from greenfield development** and associated land use activities shall be managed by: (a) using source control to minimise contaminants in the

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		discharges .		submitter's submission point for the definition of "greenfield development".	stormwater discharge and maximise, to the extent practicable, the removal of contaminants from stormwater, including through the use of water sensitive urban design measures, and (b) using hydrological control and water sensitive urban design measures to avoid, remedy or mitigate adverse effects of stormwater quantity and maintain, to the extent practicable, natural stream flows, and (c) installing, where practicable, a stormwater treatment system for stormwater discharges from a property or properties taking into account: (i) the treatment quality (load reduction factor), and (ii) opportunities for the retention or detention of stormwater flows or volume, including any flood storage volume required, and (iii) any potential adverse effects that may arise as a result of the stormwater treatment system or discharge, including erosion and scour, and localised adverse water quality effects, and (iv) inspections, monitoring and ongoing maintenance, including costs, to maintain functionality in terms of treatment quality and capacity, and (v) existing or proposed communal stormwater treatment systems in the stormwater catchment or sub-catchment, or part Freshwater Management Unit.
S206.040	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Oppose	Seeks the removal of "contaminants", noting that the term is all-encompassing. Considers the direction of clause (b) to avoid all contaminants is achievable. Considers that specific contaminants of concern should be stated, otherwise the direction should be limited to hazardous substances. Considers the policy can only regulate discharges where they enter "water", in accordance with RMA s15. Considers the policy and associated rules imply "an existing or new stormwater network" is a receiving environment, noting that they are piped and therefore not considered "water" or subject to Regional Council jurisdiction. Considers that rule	Amend policy as follows: Policy WH.P11: Discharges of ~~contaminants~~ **hazardous substances** in stormwater from high risk industrial or trade premises The discharge of stormwater to water, including discharges ~~via~~ **from** the stormwater network, from a high risk industrial or trade premise shall be managed by: a) having procedures and equipment in place to contain any spillage of hazardous substances for storage or removal, and b) avoiding ~~contaminants or~~ hazardous substances being entrained in stormwater and discharged to a surface water

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				may apply to stormwater discharges to a surface waterbody from a stormwater network, but can not manage effects before that point. Considers if the reference is retained, that it must be clarified as being "from" the stormwater network.	body or coastal water, including via the stormwater network, or where avoidance is not practicable, implementing good management practice to avoid or minimise adverse effects on the environment, including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and c) installing an interceptor where there is a risk of petroleum hydrocarbons entering into the stormwater network, a surface water body or coastal water, and d) avoiding or mitigating adverse effects of stormwater discharges on groundwater quality.
S206.041	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Seeks consequential amendments in accordance with the submitter's relief sought for the insertion of a definition for "greenfield development".	Amend policy as follows: Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces The adverse effects of stormwater discharges from new greenfield development shall be minimised, and adverse effects of stormwater discharges from existing urban areas **caused by urban development** reduced to the extent practicable, upon redevelopment, through implementing: (a) an on-site stormwater treatment system or an off-site communal stormwater treatment system that is designed to: (i) receive at least 85% of the mean annual runoff volume stormwater generated from new and redeveloped impervious surfaces of the property, and (ii) achieve copper and zinc load reductions factors equivalent to that of a raingarden/bioretention device, and (b) where stormwater discharges will enter a river, hydrological controls either on-site, or off-site via a communal
S206.042	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting	Amend	Considers financial contribution provisions inconsistent with the NPS-FM, and limits the ability to implement the effects management hierarchy. Notes that aquatic offsetting or compensation is required by the NPS-FM where there are more than minor residual adverse effects, rather than residual adverse effects generally. Considers a contribution	Amend policy as follows: Policy WH.P15: Stormwater contaminant offsetting for new greenfield development **Where** ~~T~~**there are more than minor residual** adverse effects of residual (post-treatment) **caused by** stormwater contaminants from new **greenfield development,** roads (not already captured as part of a

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		for new greenfield developm ent.		mechanism to address minor/residual effects unlikely to be effective or efficient, and concerned that financial contributions are the only form of offset that may be provided. Considers it contrary to the NPS-FM to not allow consideration for the principles set out in Appendix 6 of the NPS-FM. Notes the provisions limit the management of residual adverse effects to aquatic offsetting only, whereas the effects management hierarchy provides for aquatic compensation where aquatic offsetting is not able to be provided. Acknowledges financial contributions may be an appropriate form of aquatic offset, however seeks the policy does not frustrate the ability for other forms of aquatic offsetting or aquatic compensation. Considers the policy and associated rules imply "an existing or new stormwater network" is a receiving environment, noting that they are piped and therefore not considered "water" or subject to Regional Council jurisdiction. Considers that rule may apply to stormwater discharges to a surface waterbody from a stormwater network, but can not manage effects before that point. Considers if the reference is retained, that it must be clarified as being "from" the stormwater network. Seeks consequential amendments per the submitter's submission point for the definition of "greenfield development".	greenfield development) and state highways where the discharge will enter a surface water body or coastal water, including via from an existing or new stormwater network, **those effects must be managed by way of an aquatic offset or aquatic compensation, including through the following:** (a) ~~are to be~~ **provide an aquatic** offset by way of a financial contribution in accordance with Schedule 30 (financial contribution), **or** **(b) provide an aquatic offset in accordance with the principles for aquatic offsetting in Appendix 6 of the NPS-FM, and** **(c) where more than minor residual adverse effects cannot be offset, aquatic compensation must be provided in accordance with the principles for aquatic compensation in Appendix 7 of the NPS-FM.**
S206.043	8 Whaitua Te Whangan ui-a-Tara	Policy WH.P16: Stormwate r discharges from new unplanned greenfield	Oppose	Considers there is insufficient evidence in the s32 evaluation to justify the policy direction and to suggest that all new stormwater discharges from unplanned greenfield development will cause significant effects.	Delete policy

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		development.			
S206.044	8 Whaitua Te Whanganui-a-Tara	Policy WH.P25: Managing rural land use change.	Amend	Seeks amendment to clarify that the direction relates to primary production and not other rural land use. Considers the policy would apply to other land use activities in the rural environment, including quarrying. Suggests the term "primary production" is used to better reflect the direction.	Amend policy as follows: Policy WH.P25: Managing rural land use change Manage the actual and potential adverse effects of changing land use from low to higher intensity **primary production** ~~rural land use~~ by: (a) controlling rural land use change that is greater than 4ha and associated diffuse discharge where there is a risk the diffuse discharges of nitrogen, phosphorus, sediment or Escherichia coli may increase, and (b) only granting resource consent for such a change in land use when, in accordance with Policy P75, the diffuse discharge of nitrogen, phosphorus, sediment and Escherichia coli of the more intensive activity is demonstrated to be the same or less than the activities being replaced.
S206.045	8 Whaitua Te Whanganui-a-Tara	Policy WH.P27: Promoting stream shading.	Support	Considers shading streams is the most accessible and practicable method of reducing periphyton. Notes the use of "promoting" rather than "requiring" continues to enable other methods.	Retain as notified
S206.046	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Amend	Considers the policy focuses on "risk" rather than effect. Considers the relevance of risk under the RMA is primarily associated with natural hazards rather than a potential discharge. Seeks replacement of risk with "adverse effects" to align with RMA Part 2. Considers clause (a) refers to an outcome that is sought, rather than an activity or effect. Considers the direction of clause (b) to limit the amount of land disturbed is not always practicable.	Amend policy as follows: Policy WH.P29: Management of earthworks The ~~risk~~ **adverse effects associated with** ~~of~~ sediment discharges from earthworks shall be managed by: (a) ~~requiring retention of soil and sediment on the land~~ **undertaking earthworks in accordance with** ~~using~~ good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in **general** accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), ~~for the duration of the land disturbance,~~ and (b) **where practicable,** limiting the amount of land disturbed at any time, and (c) designing and implementing earthworks with knowledge

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					of the existing environmental site constraints, specific engineering requirements and implementation of controls to limit the discharge of sediment to receiving environments, and (d) requiring erosion and sediment control measures to be installed prior to, and during earthworks and ensuring those controls remain in place and are maintained until the land is stabilised against erosion.
S206.047	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Oppose	Notes the policy refers to "an existing or new stormwater network" and "artificial watercourse" as a receiving environment. Considers the policy can only regulate discharges where they enter "water", in accordance with RMA s15, and that water within a stormwater network is not subject to Regional Council jurisdiction. Further notes artificial watercourses are often piped or within tanks and therefore not subject to RMA s15. Seeks changes to only refer to discharges to natural receiving waterbodies. Considers the requirement in clause (c) for a "suitably qualified person" to monitor the discharge is not always practicable and will be unreasonably costly. Seeks amendment to provide discretion and to provide for a "suitably trained person". Considers the policy particularly prescriptive, reflecting conditions of a rule or consent rather than a policy directive. Submitter refers to their relief sought for the definition of "earthworks", to recognise current exceptions in the Operative NRP. Considers the policy will apply to earthworks of all kinds and scales. Considers the proposed policy and rule framework results in impracticalities due to the broad definition of earthworks, which is often not proportionate to the effects being managed.	Amend policy as follows: Policy WH.P30: Discharge standard for earthworks The discharge of sediment from earthworks over an area greater than 3,000m2 shall: (a) not exceed 100g/m3 at the point of discharge where the discharge is to a surface water body, **or** coastal water, ~~stormwater network or to an artificial watercourse,~~ except that when the discharge is to a river with background total suspended solids that exceed 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) be managed using good management practices in accordance with the GWRC Erosion and Sediment Control Guidelines for the Wellington Region (2021), to achieve the discharge standard in (a), and (c) **where required,** be monitored by a suitably qualified **or trained** person, and the results reported to the Wellington Regional Council.

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S206.048	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose	Considers the policy does not anticipate activities that require earthworks year-round such as quarrying. Considers shutting down winter earthworks within an active quarry will adversely impact regional aggregate supply and the ability to respond to a natural disaster. Considers insufficient justification is provided in the s32 evaluation for the shut down period. Disagrees with the assumption that increased sediment discharges are more likely during winter months, noting that unpredictable rainfall events can occur at any time of year, which will increase with climate change. Further notes that receiving environments are less vulnerable during winter months as water temperatures are lower and flows are higher. Seeks removal of the policy and considers risk associated with unpredictable weather events can be managed through existing provisions.	Delete policy
S206.049	8 Whaitua Te Whanganui-a-Tara	Rule WH.R1: Point source discharges of specific contaminants - prohibited activity.	Amend	Seeks amendment to reference to "stormwater network", noting that they are piped and therefore not considered "water" or subject to Regional Council jurisdiction. Considers the rule may apply to stormwater discharges to a surface waterbody from a stormwater network, but can not manage effects before that point.	Amend rule as follows: Rule WH.R1: Point source discharges of specific contaminants - prohibited activity The point source discharge of: (a) chemical cleaning products including vehicle cleaning products, detergents, bleach and disinfectant, or (b) paint and other substances used for the purpose of protecting surfaces (including stain and paint wash), or (c) solvents including paint stripper, or (d) liquid fuels, including diesel, petrol, oil, grease, except where these have been treated by an interceptor system to collect hazardous contaminants and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons, or (e) radiator coolant, or (f) cooking oil, or (g) cement wash, cement slurry and concrete cutting waste, or (h) drill cooling water into water or onto or into land, including ~~via~~ **from** a

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					stormwater network, where it may enter a surface water body or coastal water is a prohibited activity.
S206.050	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity.	Oppose	Seeks amendment to reference to "stormwater network", noting that they are piped and therefore not considered "water" or subject to Regional Council jurisdiction. Considers the rule may apply to stormwater discharges to a surface waterbody from a stormwater network, but can not manage effects before that point. Seeks removal of the refence to contaminants in clause (d), due to the broad scope of the definition of contaminants. Seeks consequential amendment in relation to the submitter's relief sought for the insertion of two rules relating to quarrying activities associated with significant mineral resources (Rules "WH.R4A" and "WH.R8A).	Amend rule as follows: Rule WH.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity The discharge of stormwater from an existing high risk industrial or trade premise, that is not a port, ~~or~~ airport or, **from a quarrying activity,** into water, or onto or into land where it may enter water, including ~~via~~ **from** an existing local authority stormwater network, is a permitted activity, provided the following conditions are met: (a) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (b) the discharge does not contain wastewater, and (c) if the discharge is to land where it may enter groundwater, (i) the discharge cannot cause or exacerbate the flooding of any other property, and (ii) the discharge is not located within 20m of a bore used for water abstraction for potable supply or stock water, and (d) any ~~contaminants~~ hazardous substances stored or used on site, ~~or hazardous substances,~~ cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or (i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or (ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons, and (e) if the discharge is into a surface water body, coastal water or via an existing local authority stormwater network, the concentration of total suspended solids in the discharge shall not exceed:

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					(i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and where the discharge is not via an existing local authority stormwater network the discharge shall also not: (f) cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (g) give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life.
S206.051	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Oppose	Notes clause (a) is not bound by time and therefore could be triggered by incremental development, which is not understood to be the intention of the condition. Seeks the condition specifies a timeframe rather than a baseline, to continue to manage the risk of staged development while ensuring long-term development of sites is reasonably provided. Seeks amendment to reference to "stormwater network", noting that they are piped and therefore not considered "water" or subject to Regional Council jurisdiction. Considers the rule may apply to stormwater discharges to a surface waterbody from a stormwater network, but can not manage effects	Amend rule as follows: Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including ~~through~~ **from** an existing or new local authority stormwater network, that is not a high risk industrial or trade premise, **a quarrying activity** or unplanned greenfield development, is a permitted activity, provided the following conditions are

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				before that point. Seeks consequential amendment to refer to quarrying activities, in relation to the submitter's relief sought for the insertion of two rules relating to quarrying activities associated with significant mineral resources (Rules "WH.R4A" and "WH.R8A).	met: (a) the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m2 **over any 12-month period** ~~(baselineproperty existing impervious area as at 30 October 2023)~~ and (b) all new building materials associated with the development shall not include exposed zinc (including galvanised steel) or copper roof, cladding and spouting materials, and (c) the proposal provides hydrological control measures (for example rain tanks) onsite or offsite, where discharges will enter a surface water body (including ~~via~~ **from** an existing local authority stormwater network): (i) for all impervious areas associated with a greenfield development, or (ii) for all redeveloped and new impervious areas involving greater than 30m2 of impervious area of a redevelopment (of an existing urbanised property), and (d) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (e) the discharge does not contain wastewater, and (f) the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and where the discharge is not ~~via~~ **from** an existing or new local authority stormwater network: (g) the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (h) the discharge shall not give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or

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					(iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life.
S206.052	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Oppose	Seeks amendment to the chapeau and clause (d) to clarify it is "from" a stormwater network rather than "through", noting that they are piped and therefore not considered "water" or subject to Regional Council jurisdiction. Considers the rule may apply to stormwater discharges to a surface waterbody from a stormwater network, but can not manage effects before that point. Seeks consequential amendment in relation to the submitter's relief sought for the insertion of two rules relating to quarrying activities associated with significant mineral resources (Rules "WH.R4A" and "WH.R8A).	Amend rule as follows: Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity The use of land for the creation of new impervious surfaces for greenfield development and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including ~~through~~ **from** an existing local authority stormwater network, that is not a high risk industrial or trade premise, **a quarrying activity** or unplanned greenfield development, is a controlled activity, provided the following conditions are met: (a) the proposal involves the creation of new impervious surfaces of between 1,000m2 and 3,000m2 (baseline property existing impervious area as at 30 October 2023) or, (b) the proposal involves the creation new impervious surfaces of less than 1,000m2, but is not permitted under the conditions of Rule WH.R5, and, (c) a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions), and (d) where stormwater directly or indirectly (~~through~~ **from** an existing local authority stormwater network) discharges to a river, hydrological control is provided either: (i) on-site, or

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					(ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has been sized to accommodate the proposed stormwater discharges, and (e) stormwater contaminant treatment is provided that captures 85% of the mean annual runoff and directs it to a stormwater treatment system that treats in accordance with Schedule 28 (contaminant treatment) and is provided either: (i) on-site, or off-site through an existing local authority stormwater network or privately owned stormwater treatment system that has capacity to treat contaminant loads from the site. Matters of control 1. The design and layout of the on-site stormwater treatment system, including the ongoing operational and management measures necessary to ensure that stormwater quality will meet the requirements of condition (e) of this rule 2. The adequacy of hydrological control measures either on-site or off- site, where stormwater will enter a river 3. Where an off-site (or a combination of on-site and off-site) stormwater treatment system is utilised, whether this has capacity, availability (timing) and appropriate authorisations to connect into 4. The long-term operational, maintenance and ownership requirements of the stormwater treatment system 5. Whether sufficient use of water sensitive urban design measures have been applied to the site design and layout 6. A financial contribution as required by Schedule 30 (financial contributions) 7. Condition of consent to demonstrate and/or monitor compliance with conditions (d) and (e) of this rule Notification In respect of Rule WH.R6, applications are precluded from limited and public notification (unless special circumstances exist).
S206.053	8 Whaitua Te	Rule WH.R11: Stormwate	Amend	Considers all new and redeveloped impervious surfaces within a high risk industrial or trade premise would trigger the rule. Considers there will	Amend rule as follows: Rule WH.R11: Stormwater from new and redeveloped

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	Whanganui-a-Tara	r from new and redeveloped impervious surfaces - discretionary activity.		be impracticalities if the definition of "high risk industrial or trade premise" applies to quarrying activities, noting examples of minor activities within a quarry that would require resource consent. Submitter is neutral to the rule, subject to other relief sought for the insertion of two rules relating to quarrying activities associated with significant mineral resources (Rules "WH.R4A" and "WH.R8A) being implemented. Seeks deletion of clause (b), in accordance with the submitter's relief sought for Policy WH.P15. Considers the potential to amend the clause to be "in accordance with Policy WH.P15" would not provide enough certainty as a condition.	impervious surfaces - discretionary activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including ~~through~~ **from** an existing local authority stormwater network, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or Rule WH.R7, or prohibited under WH.R13 is a discretionary activity provided the following conditions are met: (a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), ~~and~~ ~~(b) if the proposal is for greenfield development a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions).~~
S206.054	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Amend	Considers there is insufficient evidence to support non-complying activity status for what is considered an anticipated activity. Submitter is neutral to the rule, subject to other relief sought for the insertion of two rules relating to quarrying activities associated with significant mineral resources (Rules "WH.R4A" and "WH.R8A) being implemented.	Amend rule as follows: Rule WH.R12: All other stormwater discharges - non-complying activity The: (a) discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule WH.R2, or (b) discharge of stormwater into water or onto or into land where it may enter a surface water body or coastal water, that is not permitted by Rule WH.R3, or a restricted discretionary activity under Rules WH.R8 or WH.R9, or (c) discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule WH.R4, or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade premise that does not meet the conditions of Rule WH.R11, or (d) use of land for the creation of new or redevelopment of

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					existing impervious surfaces and the associated discharge of stormwater into water or onto or into land where it may enter water, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or WH.R7, or a discretionary activity under Rule WH.R10 or WH.R11, or a prohibited activity under WH.R13, or**(e) discharge of stormwater from a quarrying activity that is not permitted by Rule WH.R4A, does not meet restricted discretionary by Rule WH.R8A,.**
S206.055	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Opposes the rule due to constraining existing quarry operations. Notes land where existing quarry operations take place which is identified as "unplanned greenfield development" is prohibited from discharge from an impervious surface, despite holding existing consents. Notes the creation of impervious surfaces within an active quarry is inevitable. Considers the need for a private plan change to enable continued operation of a quarry is costly for what should be an anticipated activity. Considers a less restrictive activity status is adequate to effectively manage effects, and enables case-by-case assessment to provide discretion for appropriate activities to occur. Notes the prohibited activity status applies to any activity regardless of scale, nature or effect. Notes the intention of the rule indicated in the s32 evaluation is to account for new greenfield urban development not previously planned, but that the rule would apply to all development. Consider insufficient evidence is provided in the s32 evaluation to justify the rule applying to all development, particularly the costs and benefits of applying the framework to quarrying activities, noting the framework would prevent both existing and future quarrying activities. If the intent of the rule is to target urban development, seeks clarification accordingly; otherwise if the intent of the rule is to account for all development, seeks it is deleted entirely.	Either delete Rule WH.R13 in its entirety or Amend Rule WH.R13: Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity The use of land **for new urban development** and the associated discharge of stormwater from impervious surfaces from **the urban development within** unplanned greenfield development **that directly enters** ~~direct into~~ **water,** or **enters** onto or into land where it may enter a surface water body or coastal water, including ~~through~~ **from an** existing or proposed stormwater network, is a prohibited activity. Note Any urban development within an area of unplanned greenfield development proposals will require a plan change to the relevant map (Map 86, 87, 88 or 89) to allow consideration of the suitability of the site and receiving catchment(s) for accommodating the water quality requirements of the National Policy Statement for Freshwater Management 2020, and the relevant freshwater and coastal water quality objectives of this Plan. Any plan change process should be considered concurrent with any associated change to the relevant district plan, to support integrated planning and assessment.

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S206.056	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity.	Oppose	Opposes the mapping associated with the definition of "high erosion risk land (woody vegetation)", per the submitter's submission on the definition. Considers the rule limiting as it does not allow vegetation clearance of the specified land for most land uses. Considers the existing approach under Rules R104-107 of the NRP is more fit for purpose, noting the s32 evaluation does not identify implementation issues with the existing rule framework. Prefers existing rules are retained; should proposed rules remain, seeks the permitted rule provides for additional clearance up to 200m2, noting clearance greater than 200m2 is a controlled activity. Opposes the rule being subject to the Freshwater Planning Process, as it relates to erosion and soil conservation rather than specifically freshwater.	1. Review mapping and definition of "erosion prone land". 2. Consider Rule WH.R17 under a Part 1 Schedule 1 process. 3. Amend Rule WH.R17 as follows: Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a surface water body is a permitted activity provided the following conditions are met: (a) the vegetation clearance is: (i) to implement an action in the erosion risk treatment plan for the farm, or (ii) for the control of pest plants, **or** **(iii) no more than 200 m2 per property of vegetation clearance on highest erosion risk land (woody vegetation) in any consecutive 12-month period,** and (b) debris from the vegetation clearance is not placed where it can enter a surface water body.
S206.057	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land - controlled activity.	Neutral	Opposes the mapping associated with the definition of "high erosion risk land (woody vegetation)", per the submitter's submission on the definition. Notwithstanding this, supports the rule as it provides reasonable certainty to landowners that consent will be granted. Considers the rules could anticipate capturing the majority of vegetation clearance applications sought where the permitted rule is not met. Opposes the rule being subject to the Freshwater Planning Process, as it relates to erosion and soil conservation rather than specifically freshwater.	Review mapping and definition of "erosion prone land". Consider Rule WH.R18 under a Part 1 Schedule 1 process. Retain a controlled activity rule for vegetation clearance greater than 200 m2 over high erosion risk land.
S206.058	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance - discretionary activity.	Amend	Submitter is neutral to the rule, noting their support for Rule WH.R18, which is anticipated to capture most vegetation clearance that does not meet the permitted rule. Opposes the rule being subject to the Freshwater Planning Process, as it relates to erosion and soil conservation rather than specifically freshwater.	Review mapping and definition of "erosion prone land". Consider Rule WH.R18 under a Part 1 Schedule 1 process.

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S206.059	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	Notes the conjunctive requirement in clause (b) is an error, and has been corrected to "or" with RMA Clause 16. On the basis of this correction, the submitter is neutral to the rule. Notes the rule only relates to earthworks and not the associated discharge to water and considers this an error given the associated restricted discretionary and non-complying rules refer to the associated discharge. Considers condition (g) would create an inability for any earthworks to meet the rule, as any exposed sediment would result in a discharge onto land where it may enter a surface water body. Notes the rule would apply alongside Rule R91, which specifies further discharge parameters. Opposes the rule being subject to the Freshwater Planning Process, as it relates to erosion and soil conservation rather than specifically freshwater.	Consider Rule WH.R23 under a Part 1 Schedule 1 process. Amend Rule WH.R23 : Rule WH.R23: Earthworks - permitted activity Earthworks **and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including from a stormwater network,** is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, ~~and~~ **or** (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and~~(g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and~~ (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).

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S206.060	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	Opposes direction to avoid earthworks over winter months, per the submitter's submission on Policy WH.P31. Considers the rule, in conjunction with Rule WH.R25 and Policy WH.P31 effectively prohibits earthworks over winter months. Considers there is insufficient evidence to support this, and it is unreasonable for earthworks to cease over this period, particularly year-round activities such as quarrying. Considers the intent of the policy direction to minimise the risk of an uncontrolled discharge can be appropriately managed through matter of discretion 1. Therefore, seeks clause (b) and matter of discretion 8 are deleted.	Amend rule as follows: Rule WH.R24: Earthworks - restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~ Matters for discretion 1. The location, area, scale, volume, duration and staging and timing of works 2. The design and suitability of erosion of sediment control measures including consideration of hazard mitigation and the risk of accelerated soil erosion associated the staging of works and progressive stabilisation 3. The placement and treatment of stockpiled materials on the site, including requirements to remove material if it is not to be reused on the site 4. The proportion of unstabilised land in the catchment 5. The adequacy and efficiency of stabilisation devices for sediment control 6. Any adverse effects on: (i) groundwater, surface water bodies and their margins, particularly surface water bodies within sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule

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					F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori customary use) or Schedule I (important trout fishery rivers and spawning waters) (ii) group drinking water supplies and community drinking water supplies (iii) mauri, water quality (including water quality in the coastal marine area), aquatic and marine ecosystem health, aquatic and riparian habitat quality, indigenous biodiversity values, mahinga kai and critical life cycle periods for indigenous aquatic species (iv) the natural character of lakes, rivers, natural wetlands and their margins and the coastal environment (v) natural hazards, land stability, soil erosion, sedimentation and flood hazard management including the use of natural buffers 7. Duration of the consent~~8. Preparation required for the close-down period (from 1st June to 30th September each year) and any maintenance activities required during this period~~9. Monitoring and reporting requirements
S206.061	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Oppose	Opposes non-complying activity status. Considers the rule, in conjunction with Policy WH.P31, effectively prohibits earthworks during winter months. Considers there is insufficient evidence to support this, and that it does not recognise activities that are required year-round. Seeks amendment to discretionary activity status, subject to other relief sought for the insertion of two rules relating to quarrying activities associated with significant mineral resources (Rules "WH.R4A" and "WH.R8A) being implemented. Considers discretionary activity status will enable consideration of all relevant effects while accepting that not all earthworks will be contrary to the NRP.	Amend rule as follows: Rule WH.R25: Earthworks - ~~non-complying~~ **discretionary** activity Earthworks, and the associated discharge of sediment into a surface water body or coastal water or onto or into land where it may enter a surface water body or coastal water from earthworks, including via a stormwater network, that does not comply with Rule WH.R24 is a ~~non-complying~~ **discretionary** activity.
S206.062	9 Te Awarua-o-Porirua Whaitua	Objective P.O6: Water quality,	Amend	Concerned over whether the improvements sought are too ambitious and unrealistic in the proposed timeframe. Considers the requirement to move from the existing D state to B state for periphyton	Revise the improvement requirements of Table 9.2 or the timeframe to ensure that outcomes can be realistically achieved;

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		habitats, water quantity and ecological processes of rivers are maintained or improved.		biomass; and from the existing C state to A state for E. Coli will require significant land use change. Considers (c) unrealistic, and that it does not account for seasonal shifts in water quality and ecological condition. Considers there is no certainty for what the expectations are.	and Amend Objective P.O6: Objective P.O6 Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved by ensuring that: (a) where a target attribute state in Table 9.2 is not met, the state of that attribute is improved in all rivers and river reaches in the part Freshwater Management Unit so that the target attribute state is met within the timeframe indicated within Table 9.2, and (b) where a target attribute state in Table 9.2 is met, the state of that attribute is at least maintained in all rivers within the part Freshwater Management Unit, and~~(c) where any attribute in any river or river reach is in a better state than the target attribute state, that attribute is at least maintained at the better state in every river or river reach, and~~ (d) where a huanga of mahinga kai and Māori customary use for locations identified in Schedule B (Ngā Taonga Nui a Kiwa) and is not achieved, the state of the river or river reach is improved.
S206.063	9 Te Awarua-o-Porirua Whaitua	Policy P.P1: Improvement of aquatic ecosystem health.	Amend	Considers (a) requires progressive reduction in the load and concentration of contaminants for all water bodies, regardless of whether improvement is required or not. Seeks clarification accordingly. Considers (b) would apply to all habitats, including exotic. Notes the NPS-FM does not require restoration of all habitats, but is rather limited to indigenous wetland habitat, where the habitat is degraded. Seeks clarification accordingly. Considers it unclear what is being coordinated and prioritised in (d), and what "catchments that require changes to land use activities that impact water" means. Considers the clause should refer to enabling work programmes that provide for	Amend policy as follows: Policy P.P1: Improvement of aquatic ecosystem health Aquatic ecosystem health will be improved by: (a) progressively reducing the load or concentration of contaminants **where improvement in water quality is required,** particularly sediment, nutrients, pathogens and metals, entering water, and (b) restoring **indigenous habitats that have been degraded,** and (c) enhancing the natural flow regime of rivers and managing water flows and levels, including where there is interaction of flows between surface water and groundwater, and (d) co-ordinating and ~~prioritising~~ **enabling** work programmes in catchments **that seek to improve aquatic ecosystem**

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				improvement. Suggests consideration as to whether clause is better suited as a method rather than a policy directive.	**health** ~~require changes to land use activities that impact on water.~~
S206.064	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Oppose	Considers clause (a) prescribes the activity status of an activity, rather than focusing on an adverse effect. Notes "unplanned greenfield development" may be applied generally, given "greenfield development" is not defined, meaning that development within an area mapped as "unplanned" would be subject to this direction. Considers financial contribution provisions inconsistent with the NPS-FM, and limits the ability to implement the effects management hierarchy. Notes that aquatic offsetting or compensation is required by the NPS-FM where there are more than minor residual adverse effects, rather than residual adverse effects generally. Considers a contribution mechanism to address minor/residual effects unlikely to be effective or efficient, and concerned that financial contributions are the only form of offset that may be provided. Considers it contrary to the NPS-FM to not allow consideration for the principles set out in Appendix 6 of the NPS-FM. Notes the provisions limit the management of residual adverse effects to aquatic offsetting only, whereas the effects management hierarchy provides for aquatic compensation where aquatic offsetting is not able to be provided. Acknowledges financial contributions may be an appropriate form of aquatic offset, however seeks the policy does not frustrate the ability for other forms of aquatic offsetting or aquatic compensation. Supports the direction of clause (e), however notes the planting of riparian margins may not always be practicable.	Amend policy as follows: Policy P.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (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 (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation **where practicable,** and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.
S206.065	9 Te Awarua-	Policy P.P5:	Amend	Considers the policy implies clauses (a)-(e) must be avoided even within the mixing zone. Considers this	Amend policy as follows:

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	o-Porirua Whaitua	Localised adverse effects of point source discharges .		is not a realistic requirement, as any discharge can cause at least one of those effects at a localised level. Seeks changes to clarify the policy focus on limiting those effects to the mixing zone, and avoiding significant adverse effects beyond the zone of reasonable mixing.	Policy P.P5: Localised adverse effects of point source discharge The localised adverse effects of point source discharges to freshwater and coastal water **are as far as practicable retained within** ~~beyond~~ the zone of reasonable mixing. ~~are avoided or minimised~~ **Significant adverse effects beyond the zone of reasonable mixing must be avoided,** including by avoiding **the following effects:** (a) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (b) any conspicuous change in colour or visual clarity, or (c) any emission of objectionable odour, or (d) the rendering of freshwater unsuitable for consumption by farm animals, or (e) any significant adverse effects on aquatic life including through: (i) change in temperature, or (ii) reduced dissolved oxygen in surface water bodies, or (iii) increased toxicity effects.
S206.066	9 Te Awarua-o-Porirua Whaitua	Policy P.P7 Discharges to groundwater.	Amend	Considers the requirement that all discharges "shall not degrade" is not clear or directly measurable. Considers direction should be focused on "maintaining" groundwater quality based on its use, in accordance with NPS-FM Policy 5. Notes there is no indication on what "degraded groundwater" means, and considers it must be aligned with a limit depending on the use of the groundwater.	Amend policy as follows: Policy P.P7: Discharges to groundwater All discharges to land that may enter groundwater, and discharges to groundwater, shall **maintain** ~~not degrade the quality of~~ groundwater **quality to continue to provide for its existing and future use,**. ~~and w~~**W**here the ~~quality of~~ groundwater **quality is not meeting national guidelines** ~~is degraded, existing~~ discharges shall be managed in a way that to improves groundwater quality.
S206.067	9 Te Awarua-o-Porirua Whaitua	Policy P.P10: Managing adverse effects of stormwater discharges .	Amend	Considers the policy would apply to stormwater discharges from a quarry, and that the direction is not practicable. Considers the requirements appropriate for urban development, but not appropriate for non-urban activities. Seeks amendment to relate specifically to stormwater discharges from greenfield development, per the submitter's submission point for the definition of "greenfield development".	Amend policy as follows: Policy P.P10: Managing adverse effects of stormwater discharges All stormwater discharges **from new greenfield development** and associated land use activities shall be managed by: (a) using source control to minimise contaminants in the stormwater discharge and maximise, to the extent

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					practicable, the removal of contaminants from stormwater, including through the use of water sensitive urban design measures, and (b) using hydrological control and water sensitive urban design measures to avoid, remedy or mitigate adverse effects of stormwater quantity and maintain, to the extent practicable, natural stream flows, and (c) installing, where practicable, a stormwater treatment system for stormwater discharges from a property or properties taking into account: (i) the treatment quality (load reduction factor), and (ii) opportunities for the retention or detention of stormwater flows or volume, including any flood storage volume required, and (iii) any potential adverse effects that may arise as a result of the stormwater treatment system or discharge, including erosion and scour, and localised adverse water quality effects, and (iv) inspections, monitoring and ongoing maintenance, including costs, to maintain functionality in terms of treatment quality and capacity, and (v) existing or proposed communal stormwater treatment systems in the stormwater catchment or sub-catchment, or part Freshwater Management Unit.
S206.068	9 Te Awarua-o-Porirua Whaitua	Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises.	Amend	Seeks the removal of "contaminants", noting that the term is all-encompassing. Considers the direction of clause (b) to avoid all contaminants is achievable. Considers that specific contaminants of concern should be stated, otherwise the direction should be limited to hazardous substances. Considers the policy can only regulate discharges where they enter "water", in accordance with RMA s15. Considers the policy and associated rules imply "an existing or new stormwater network" is a receiving environment, noting that they are piped and therefore not considered "water" or subject to Regional Council jurisdiction. Considers that rule may apply to stormwater discharges to a surface waterbody from a stormwater network, but can not	Amend policy as follows: Policy P.P11: Discharges of ~~contaminants~~ **hazardous substances** in stormwater from high risk industrial or trade premises The discharge of stormwater to water, including discharges ~~via~~ **from** the stormwater network, from a high risk industrial or trade premise shall be managed by: (a) having procedures and equipment in place to contain any spillage of hazardous substances for storage or removal, and (b) avoiding ~~contaminants or~~ hazardous substances being entrained in stormwater and discharged to a surface water body or coastal water, including via the stormwater network, or where avoidance is not practicable, implementing good

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				manage effects before that point. Considers if the reference is retained, that it must be clarified as being "from" the stormwater network.	management practice to avoid or minimise adverse effects on the environment, including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and (c) installing an interceptor where there is a risk of petroleum hydrocarbons entering into the stormwater network, a surface water body or coastal water, and (d) avoiding or mitigating adverse effects of stormwater discharges on groundwater quality.
S206.069	9 Te Awarua-o-Porirua Whaitua	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Seeks consequential amendments in accordance with the submitter's relief sought for the insertion of a definition for "greenfield development", and to directly reference urban development as the activity the policy relates to.	Amend Policy P.P13 as follows: Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces The adverse effects of stormwater discharges from new **greenfield development** shall be minimised, and adverse effects of stormwater discharges from existing urban areas **caused by urban development** reduced to the extent practicable, upon redevelopment, through implementing: (a) an on-site stormwater treatment system or an off-site communal stormwater treatment system that is designed to: (i) receive at least 85% of the mean annual runoff volume stormwater generated from new and redeveloped impervious surfaces of the property, and (ii) achieve copper and zinc load reductions factors equivalent to that of a raingarden/bioretention device, and (b) where stormwater discharges will enter a river, hydrological controls either on-site, or off-site via a communal
S206.070	9 Te Awarua-o-Porirua Whaitua	Policy P.P14: Stormwater contaminant offsetting for new greenfield	Amend	Considers financial contribution provisions inconsistent with the NPS-FM, and limits the ability to implement the effects management hierarchy. Notes that aquatic offsetting or compensation is required by the NPS-FM where there are more than minor residual adverse effects, rather than residual adverse effects generally. Considers a contribution mechanism to address minor/residual effects unlikely to be effective or efficient, and concerned that financial contributions are the only form of	Amend policy as follows: Policy P.P14: Stormwater contaminant offsetting for new greenfield development **Where ~~T~~there are more than minor residual** adverse effects ~~of residual~~ (post-treatment) **caused by** stormwater contaminants from new **greenfield development,** roads (not already captured as part of a greenfield development) and state highways where the discharge will enter a surface water body or coastal water, including ~~via~~ **from** an existing or new stormwater network,

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		developm ent.		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. Considers the policy and associated rules imply "an existing or new stormwater network" is a receiving environment, noting that they are piped and therefore not considered "water" or subject to Regional Council jurisdiction. Considers that rule may apply to stormwater discharges to a surface waterbody from a stormwater network, but can not manage effects before that point. Considers if the reference is retained, that it must be clarified as being "from" the stormwater network. Seeks consequential amendments per the submitter's submission point for the definition of "greenfield development".	**those effects must be managed by way of an aquatic offset or aquatic compensation, including through the following:** (a) ~~are to be~~ **provide an aquatic** offset by way of a financial contribution in accordance with Schedule 30 (financial contribution), **or** **(b) provide an aquatic offset in accordance with the principles for aquatic offsetting in Appendix 6 of the NPS-FM, and** **(c) where more than minor residual adverse effects cannot be offset, aquatic compensation must be provided in accordance with the principles for aquatic compensation in Appendix 7 of the NPS-FM.**
S206.071	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwate r discharges from new unplanned greenfield developm ent.	Oppose	Considers there is insufficient evidence in the s32 evaluation to justify the policy direction and to suggest that all new stormwater discharges from unplanned greenfield development will cause significant effects.	Delete policy

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S206.072	9 Te Awarua-o-Porirua Whaitua	Policy P.P24: Managing rural land use change.	Amend	Seeks amendment to clarify that the direction relates to primary production and not other rural land use. Considers the policy would apply to other land use activities in the rural environment, including quarrying. Suggests the term "primary production" is used to better reflect the direction.	Amend policy as follows: Policy P.P24: Managing rural land use change Manage the actual and potential adverse effects of changing land use from low to higher intensity **primary production** ~~rural land use~~ by: (a) controlling rural land use change that is greater than 4ha and associated diffuse discharge where there is a risk the diffuse discharges of nitrogen, phosphorus, sediment or Escherichia coli may increase, and (b) only granting resource consent for such a change in land use when, in accordance with Policy P75, the diffuse discharge of nitrogen, phosphorus, sediment and Escherichia coli of the more intensive activity is demonstrated to be the same or less than the activities being replaced.
S206.073	9 Te Awarua-o-Porirua Whaitua	Policy P.P25: Promoting stream shading.	Support	Considers shading streams is the most accessible and practicable method of reducing periphyton. Notes the use of "promoting" rather than "requiring" continues to enable other methods.	Retain as notified
S206.074	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Amend	Considers the policy focuses on "risk" rather than effect. Considers the relevance of risk under the RMA is primarily associated with natural hazards rather than a potential discharge. Seeks replacement of risk with "adverse effects" to align with RMA Part 2. Considers clause (a) refers to an outcome that is sought, rather than an activity or effect. Considers the direction of clause (b) to limit the amount of land disturbed is not always practicable.	Policy P.P27: Management of earthworks The ~~risk~~ **adverse effects associated with** ~~of~~ sediment discharges from earthworks shall be managed by: Amend policy as follows: (a) ~~requiring retention of soil and sediment on the land~~ **undertaking earthworks in accordance with** ~~using~~ good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in **general** accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), ~~for the duration of the land disturbance,~~ and (b) **where practicable,** limiting the amount of land disturbed at any time, and (c) designing and implementing earthworks with knowledge of the existing environmental site constraints, specific engineering requirements and implementation of controls to

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					limit the discharge of sediment to receiving environments, and (d) requiring erosion and sediment control measures to be installed prior to, and during earthworks and ensuring those controls remain in place and are maintained until the land is stabilised against erosion.
S206.075	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Amend	Notes the policy refers to "an existing or new stormwater network" and "artificial watercourse" as a receiving environment. Considers the policy can only regulate discharges where they enter "water", in accordance with RMA s15, and that water within a stormwater network is not subject to Regional Council jurisdiction. Further notes artificial watercourses are often piped or within tanks and therefore not subject to RMA s15. Seeks changes to only refer to discharges to natural receiving waterbodies. Considers the requirement in clause (c) for a "suitably qualified person" to monitor the discharge is not always practicable and will be unreasonably costly. Seeks amendment to provide discretion and to provide for a "suitably trained person". Considers the policy particularly prescriptive, reflecting conditions of a rule or consent rather than a policy directive.	Amend policy as follows: Policy P.P28: Discharge standard for earthworks The discharge of sediment from earthworks over an area greater than 3,000m2 shall: (a) not exceed 100g/m3 at the point of discharge where the discharge is to a surface water body, **or** coastal water, ~~stormwater network or to an artificial watercourse,~~ except that when the discharge is to a river with background total suspended solids that exceed 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) be managed using good management practices in accordance with the GWRC Erosion and Sediment Control Guidelines for the Wellington Region (2021), to achieve the discharge standard in (a), and (c) **where required,** be monitored by a suitably qualified **or trained** person, and the results reported to the Wellington Regional Council.
S206.076	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose	Considers the policy does not anticipate activities that require earthworks year-round such as quarrying. Considers shutting down winter earthworks within an active quarry will adversely impact regional aggregate supply and the ability to respond to a natural disaster. Considers insufficient justification is provided in the s32 evaluation for the shut down period. Disagrees with the assumption that increased sediment discharges are more likely	Delete policy

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				during winter months, noting that unpredictable rainfall events can occur at any time of year, which will increase with climate change. Further notes that receiving environments are less vulnerable during winter months as water temperatures are lower and flows are higher. Seeks removal of the policy and considers risk associated with unpredictable weather events can be managed through existing provisions.	
S206.077	9 Te Awarua-o-Porirua Whaitua	Rule P.R1: Point source discharges of specific contaminants - prohibited activity.	Amend	Seeks amendment to reference to "stormwater network", noting that they are piped and therefore not considered "water" or subject to Regional Council jurisdiction. Considers the rule may apply to stormwater discharges to a surface waterbody from a stormwater network, but can not manage effects before that point.	Amend rule as follows: Rule P.R1: Point source discharges of specific contaminants - prohibited activity The point source discharge of: (a) chemical cleaning products including vehicle cleaning products, detergents, bleach and disinfectant, or (b) paint and other substances used for the purpose of protecting surfaces (including stain and paint wash), or (c) solvents including paint stripper, or (d) liquid fuels, including diesel, petrol, oil, grease, except where these have been treated by an interceptor system to collect hazardous contaminants and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons, or (e) radiator coolant, or (f) cooking oil, or (g) cement wash, cement slurry and concrete cutting waste, or (h) drill cooling water into water or onto or into land, including ~~via~~ **from** a stormwater network, where it may enter a surface water body or coastal water is a prohibited activity.
S206.078	9 Te Awarua-o-Porirua Whaitua	Rule P.R4: Stormwater from an existing high risk industrial or trade	Amend	Seeks amendment to reference to "stormwater network", noting that they are piped and therefore not considered "water" or subject to Regional Council jurisdiction. Considers the rule may apply to stormwater discharges to a surface waterbody from a stormwater network, but can not manage effects before that point.	Amend rule as follows: Rule P.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity The discharge of stormwater from an existing high risk industrial or trade premise, that is not a port, ~~or~~ airport or **from quarrying activities,** into water, or onto or into land

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		premise - permitted activity.		Seeks removal of the refence to contaminants in clause (d), due to the broad scope of the definition of contaminants. Seeks consequential amendment in relation to the submitter's relief sought for the insertion of rules relating to quarrying activities associated with significant mineral resources (Rules "WH.R4A", "WH.R8A", "P.R4A" and "P.R8A").	where it may enter water, including ~~via~~ **from** an existing local authority stormwater network, is a permitted activity, provided the following conditions are met: (a) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (b) the discharge does not contain wastewater, and (c) if the discharge is to land where it may enter groundwater, (i) the discharge cannot cause or exacerbate the flooding of any other property, and (ii) the discharge is not located within 20m of a bore used for water abstraction for potable supply or stock water, and (d) any ~~contaminants~~ hazardous substances stored or used on site, ~~or hazardous substances,~~ cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or (i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or (ii) the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons, and (e) if the discharge is into a surface water body, coastal water or via an existing local authority stormwater network, the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and where the discharge is not via an existing local authority stormwater network the discharge shall also not: (f) cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and

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					(g) give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (ii) any conspicuous change in the colour, or (iii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (iv) any emission of objectionable odour, or (v) the freshwater is unsuitable for consumption by farm animals, or (vi) any significant adverse effects on aquatic life.
S206.079	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Notes clause (a) is not bound by time and therefore could be triggered by incremental development, which is not understood to be the intention of the condition. Seeks the condition specifies a timeframe rather than a baseline, to continue to manage the risk of staged development while ensuring long-term development of sites is reasonably provided. Seeks amendment to reference to "stormwater network", noting that they are piped and therefore not considered "water" or subject to Regional Council jurisdiction. Considers the rule may apply to stormwater discharges to a surface waterbody from a stormwater network, but can not manage effects before that point. Seeks consequential amendment to refer to quarrying activities, in relation to the submitter's relief sought for the insertion of two rules relating to quarrying activities associated with significant mineral resources (Rules "P.R4A" and "P.R8A").	Amend rule as follows: Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including ~~through~~ **from** an existing or new local authority stormwater network, that is not a high risk industrial or trade premise, **a quarrying activity** or unplanned greenfield development, is a permitted activity, provided the following conditions are met: (a) the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m2 ~~(baseline property existing impervious area as at 30 October 2023)~~ and (b) all new building materials associated with the development shall not include exposed zinc (including galvanised steel) or copper roof, cladding and spouting materials, and (c) the proposal provides hydrological control measures (for

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					example rain tanks) onsite or offsite, where discharges will enter a surface water body (including ~~via~~ **from** an existing local authority stormwater network): (i) for all impervious areas associated with a greenfield development, or (ii) for all redeveloped and new impervious areas involving greater than 30m2 of impervious area of a redevelopment (of an existing urbanised property), and (d) the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and (e) the discharge does not contain wastewater, and (f) the concentration of total suspended solids in the discharge shall not exceed: (i) 50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or (ii) 100g/m3 where the discharge enters any other water, and where the discharge is not ~~via~~ **from** an existing or new local authority stormwater network: (g) the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and (h) the discharge shall not give rise to the following effects beyond the zone of reasonable mixing: (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (vii) any conspicuous change in the colour, or (viii) a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or (ix) any emission of objectionable odour, or (x) the freshwater is unsuitable for consumption by farm animals, or (xi) any significant adverse effects on aquatic life.

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S206.080	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Seeks amendment to the chapeau and clause (d) to clarify it is "from" a stormwater network rather than "through", noting that they are piped and therefore not considered "water" or subject to Regional Council jurisdiction. Considers the rule may apply to stormwater discharges to a surface waterbody from a stormwater network, but can not manage effects before that point. Seeks consequential amendment in relation to the submitter's relief sought for the insertion of rules relating to quarrying activities associated with significant mineral resources (Rules "WH.R4A", "WH.R8A", "P.R4A" and "P.R8A")	Amend rule as follows: Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity The use of land for the creation of new impervious surfaces for greenfield development and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including ~~through~~ **from** an existing local authority stormwater network, that is not a high risk industrial or trade premise, **a quarrying activity** or unplanned greenfield development, is a controlled activity, provided the following conditions are met: (a) the proposal involves the creation of new impervious surfaces of between 1,000m2 and 3,000m2 (baseline property existing impervious area as at 30 October 2023) or, (b) the proposal involves the creation new impervious surfaces of less than 1,000m2, but is not permitted under the conditions of Rule WH.R5, and, (c) a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions), and (d) where stormwater directly or indirectly (~~through~~ from an existing local authority stormwater network) discharges to a river, hydrological control is provided either: (i) on-site, or (ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has been sized to accommodate the proposed stormwater discharges, and (e) stormwater contaminant treatment is provided that captures 85% of the mean annual runoff and directs it to a stormwater treatment system that treats in accordance with Schedule 28 (contaminant treatment) and is provided either: (i) on-site, or off-site through an existing local authority stormwater network or privately owned stormwater treatment

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					system that has capacity to treat contaminant loads from the site. Matters of control 1. The design and layout of the on-site stormwater treatment system, including the ongoing operational and management measures necessary to ensure that stormwater quality will meet the requirements of condition (e) of this rule 2. The adequacy of hydrological control measures either on-site or off- site, where stormwater will enter a river 3. Where an off-site (or a combination of on-site and off-site) stormwater treatment system is utilised, whether this has capacity, availability (timing) and appropriate authorisations to connect into 4. The long-term operational, maintenance and ownership requirements of the stormwater treatment system 5. Whether sufficient use of water sensitive urban design measures have been applied to the site design and layout 6. A financial contribution as required by Schedule 30 (financial contributions) 7. Condition of consent to demonstrate and/or monitor compliance with conditions (d) and (e) of this rule Notification In respect of Rule WH.R6, applications are precluded from limited and public notification (unless special circumstances exist).
S206.081	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Amend	Seeks deletion of clause (b), in accordance with the submitter's relief sought for Policy P.P15. Considers the potential to amend the clause to be "in accordance with Policy P.P15" would not provide enough certainty as a condition.	Amend rule as follows: Rule P.R10: Stormwater from new and redeveloped impervious surfaces - discretionary activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including ~~through~~ **from** an existing local authority stormwater network, that is not permitted by Rule P.R5, or a controlled activity under Rule P.R6 or Rule P.R7, or prohibited under P.R12 is a discretionary activity

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					provided the following conditions are met: (a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), ~~and~~ ~~(b) if the proposal is for greenfield development a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions).~~
S206.082	9 Te Awarua-o-Porirua Whaitua	Rule P.R11: All other stormwater discharges - non-complying activity.	Amend	Considers there is insufficient evidence to support non-complying activity status for what is considered an anticipated activity. Submitter is neutral to the rule, subject to other relief sought for the insertion of rules relating to quarrying activities associated with significant mineral resources (Rules "WH.R4A", "WH.R8A", "P.R4A" and "P.R8A") being implemented.	Amend rule as follows: Rule P.R11: All other stormwater discharges - non-complying activity The: (a) discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule P.R2, or (b) discharge of stormwater into water or onto or into land where it may enter a surface water body or coastal water, that is not permitted by Rule P.R3, or a restricted discretionary activity under Rules P.R8, or (c) discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule P.R4, or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade premise that does not meet the conditions of Rule P.R10, or (d) use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater water or onto or into land where it may enter water, that is not permitted by Rule P.R5, or a controlled activity under Rules P.R6 or P.R7, or a discretionary activity under Rule P.R9, or a prohibited activity under Rule P.R12, **or** **(e) discharge of stormwater from a quarrying activity that is not permitted by Rule WH.R4A, does not meet restricted discretionary by Rule WH.R8A,.**

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S206.083	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Oppose	Opposes the rule due to constraining existing quarry operations. Notes land where existing quarry operations take place which is identified as "unplanned greenfield development" is prohibited from discharge from an impervious surface, despite holding existing consents. Notes the creation of impervious surfaces within an active quarry is inevitable. Considers the need for a private plan change to enable continued operation of a quarry is costly for what should be an anticipated activity. Considers a less restrictive activity status is adequate to effectively manage effects, and enables case-by-case assessment to provide discretion for appropriate activities to occur. Notes the prohibited activity status applies to any activity regardless of scale, nature or effect. Notes the intention of the rule indicated in the s32 evaluation is to account for new greenfield urban development not previously planned, but that the rule would apply to all development. Consider insufficient evidence is provided in the s32 evaluation to justify the rule applying to all development, particularly the costs and benefits of applying the framework to quarrying activities, noting the framework would prevent both existing and future quarrying activities. If the intent of the rule is to target urban development, seeks clarification accordingly; otherwise if the intent of the rule is to account for all development, seeks it is deleted entirely.	Either delete Rule P.R11 in its entirety or Amend Rule P.R11: Rule P.R13: Stormwater from new unplanned greenfield development - prohibited activity The use of land **for new urban development** and the associated discharge of stormwater from impervious surfaces from **the urban development** within unplanned greenfield development **that directly enters** ~~direct into~~ **water,** or **enters** onto or into land where it may enter a surface water body or coastal water, including ~~through~~ **from an** existing or proposed stormwater network, is a prohibited activity. Note Any urban development within an area of unplanned greenfield development proposals will require a plan change to the relevant map (Map 86, 87, 88 or 89) to allow consideration of the suitability of the site and receiving catchment(s) for accommodating the water quality requirements of the National Policy Statement for Freshwater Management 2020, and the relevant freshwater and coastal water quality objectives of this Plan. Any plan change process should be considered concurrent with any associated change to the relevant district plan, to support integrated planning and assessment.
S206.084	9 Te Awarua-o-Porirua Whaitua	Rule P.R16: Vegetation clearance on highest erosion risk land-permitted activity.	Oppose	Opposes the mapping associated with the definition of "high erosion risk land (woody vegetation)", per the submitter's submission on the definition. Considers the rule limiting as it does not allow vegetation clearance of the specified land for most land uses. Considers the existing approach under Rules R104-107 of the NRP is more fit for purpose, noting the s32 evaluation does not identify implementation issues with the existing rule framework. Prefers existing rules are retained;	1. Review mapping and definition of "erosion prone land". 2. Consider Rule P.R16 under a Part 1 Schedule 1 process. 3. Amend Rule P.R16 as follows: Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a surface water body is a permitted activity provided the following conditions are met: (a) the vegetation clearance is:

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				should proposed rules remain, seeks the permitted rule provides for additional clearance up to 200m2, noting clearance greater than 200m2 is a controlled activity. Opposes the rule being subject to the Freshwater Planning Process, as it relates to erosion and soil conservation rather than specifically freshwater.	(i) to implement an action in the erosion risk treatment plan for the farm, or (ii) for the control of pest plants, **or** **(iii) no more than 200 m2 per property of vegetation clearance on highest erosion risk land (woody vegetation) in any consecutive 12-month period,** and (b) debris from the vegetation clearance is not placed where it can enter a surface water body.
S206.085	9 Te Awarua-o-Porirua Whaitua	Rule P.R17: Vegetation clearance on highest erosion risk land - controlled activity.	Neutral	Opposes the mapping associated with the definition of "high erosion risk land (woody vegetation)", per the submitter's submission on the definition. Notwithstanding this, supports the rule as it provides reasonable certainty to landowners that consent will be granted. Considers the rules could anticipate capturing the majority of vegetation clearance applications sought where the permitted rule is not met. Opposes the rule being subject to the Freshwater Planning Process, as it relates to erosion and soil conservation rather than specifically freshwater.	Review mapping and definition of "erosion prone land". Consider Rule P.R17 under a Part 1 Schedule 1 process. Retain a controlled activity rule for vegetation clearance greater than 200 m2 over high erosion risk land.
S206.086	9 Te Awarua-o-Porirua Whaitua	Rule P.R18: Vegetation clearance - discretionary activity.	Amend	Submitter is neutral to the rule, noting their support for Rule P.R17, which is anticipated to capture most vegetation clearance that does not meet the permitted rule. Opposes the rule being subject to the Freshwater Planning Process, as it relates to erosion and soil conservation rather than specifically freshwater.	Review mapping and definition of "erosion prone land". Consider Rule P.R18 under a Part 1 Schedule 1 process.
S206.087	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Amend	Notes the conjunctive requirement in clause (b) is an error, and has been corrected to "or" with RMA Clause 16. On the basis of this correction, the submitter is neutral to the rule. Notes the rule only relates to earthworks and not the associated discharge to water and considers this an error given the associated restricted discretionary and non-complying rules refer to the associated discharge. Considers condition (g) would create an inability for any earthworks to meet the rule, as any exposed sediment would result in a discharge onto land	Consider Rule P.R22 under a Part 1 Schedule 1 process. Amend Rule P.R22 as follows: Rule P.R22: Earthworks - permitted activity Earthworks **and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including from a stormwater network,** is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion

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				where it may enter a surface water body. Notes the rule would apply alongside Rule R91, which specifies further discharge parameters. Opposes the rule being subject to the Freshwater Planning Process, as it relates to erosion and soil conservation rather than specifically freshwater.	risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, ~~and~~ **or** (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and~~(g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and~~ (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).
S206.088	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Amend	Opposes direction to avoid earthworks over winter months, per the submitter's submission on Policy P.P29. Considers the rule, in conjunction with Rule P.R24 and Policy P.P29 effectively prohibits earthworks over winter months. Considers there is insufficient evidence to support this, and it is unreasonable for earthworks to cease over this period, particularly year-round activities such as quarrying. Considers the intent of the policy direction to minimise the risk of an uncontrolled discharge can be appropriately managed through	Amend rule as follows: Rule P.R23: Earthworks - restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule P.R22 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3,

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				matter of discretion 1. Therefore, seeks clause (b) and matter of discretion 8 are deleted.	except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~ Matters for discretion 1. The location, area, scale, volume, duration and staging and timing of works 2. The design and suitability of erosion of sediment control measures including consideration of hazard mitigation and the risk of accelerated soil erosion associated the staging of works and progressive stabilisation 3. The placement and treatment of stockpiled materials on the site, including requirements to remove material if it is not to be reused on the site 4. The proportion of unstabilised land in the catchment 5. The adequacy and efficiency of stabilisation devices for sediment control 6. Any adverse effects on: (i) groundwater, surface water bodies and their margins, particularly surface water bodies within sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori customary use) or Schedule I (important trout fishery rivers and spawning waters) (ii) group drinking water supplies and community drinking water supplies (iii) mauri, water quality (including water quality in the coastal marine area), aquatic and marine ecosystem health, aquatic and riparian habitat quality, indigenous biodiversity values, mahinga kai and critical life cycle periods for indigenous aquatic species

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					(iv) the natural character of lakes, rivers, natural wetlands and their margins and the coastal environment (v) natural hazards, land stability, soil erosion, sedimentation and flood hazard management including the use of natural buffers 7. Duration of the consent~~8. Preparation required for the close down period (from 1st June to 30th September each year) and any maintenance activities required during this period~~ 9. Monitoring and reporting requirements
S206.089	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks - non-complying activity.	Oppose	Opposes non-complying activity status. Considers the rule, in conjunction with Policy P.P29, effectively prohibits earthworks during winter months. Considers there is insufficient evidence to support this, and that it does not recognise activities that are required year-round. Seeks amendment to discretionary activity status, subject to other relief sought for the insertion of rules relating to quarrying activities associated with significant mineral resources (Rules "WH.R4A", "WH.R8A", "P.R4A" and "P.R8A") being implemented. Considers discretionary activity status will enable consideration of all relevant effects while accepting that not all earthworks will be contrary to the NRP.	Amend rule as follows: Rule P.R24: Earthworks - ~~non-complying~~ **discretionary** activity Earthworks, and the associated discharge of sediment into a surface water body or coastal water or onto or into land where it may enter a surface water body or coastal water from earthworks, including via a stormwater network, that does not comply with Rule P.R24 is a ~~non-complying~~ **discretionary** activity.
S206.090	12 Schedules	Schedule 29: Stormwater Impact Assessments.	Neutral	Supports the promotion of best practice in the preparation of stormwater impact assessments, however opposes the schedule if it applied to quarrying activities. Subject to other relief sought for the insertion of rules relating to quarrying activities associated with significant mineral resources (Rules "WH.R4A", "WH.R8A", "P.R4A" and "P.R8A"), the schedule would not apply to quarrying activities and the submitter would be neutral.	Neutral, subject to relief sought for insertion of new Rules WH.R4A and WH.R8A being implemented; Or; Delete provision
S206.091	12 Schedules	Schedule 30: Financial Contributions.	Neutral	Considers requirement of a financial contribution as offset may only be applied where it is optional, along with other forms of aquatic offsetting. Subject to relief sought by the submitter regarding Policy WH.P15 and Rule WH.R11, the submitter is neutral to the schedule. Notes the s32 states there is no	Neutral, subject to relief sought for Policy WH.P15 and Rule WH.R11 being implemented; Or; Delete provision

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				"double-dipping" of development contributions as contributions collected by territorial authorities are for the installation and maintenance of pipes, whereas contributions collected by GWRC are for water quality improvements. Considers it unclear how GWRC and local authorities will distinguish between collected funds that are distributed to a stormwater network utility operator.	
S206.092	12 Schedules	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Amend	Considers objective (d) under part B is not practicable, noting that restoring and revegetating is not always practicable, particularly for activities such as quarrying where surfaces remain exposed. Opposes the schedule being subject to the Freshwater Planning Process, as it directly relates to erosion and soil conservation rather than freshwater.	Consider Schedule 33 under a Part 1 Schedule 1 process. Amend Part B of Schedule 33: A Management objectives The Erosion and Sediment Management Plan must demonstrate that the measures adopted to address the identified risks will: (a) minimise sediment loss from the vegetation clearance by adopting, as a minimum, good management practice, and (b) avoid an increase in risk of loss of sediment to water relative to the risk of loss that exists from the land in a natural state, and (c) minimise the discharge of water and sediment resulting from the vegetation clearance into a surface water body, and (d) **where appropriate,** provide for the land to be restored and revegetated with appropriate species.
S206.093	13 Maps	Map 89: Unplanned greenfield areas - Hutt City Council.	Oppose	Notes Map 89 identifies part of the Belmont Quarry site as "unplanned greenfield development". Seeks mapping is updated to ensure that no part of the submitter's sites are captured as unplanned greenfield development to avoid misinterpretation.	Amend Map 89 to exclude Winstone's sites as unplanned greenfield development being parcels legally described as: Part Lot 1 Deposited Plan 22561, Lot 1 Deposited Plan 60552, Lot 5 Deposited Plan 322126, Lot 4 Deposited Plan 322126, Lot 100 Deposited Plan 322126, and Lot 1 Deposited Plan 28205
S206.094	13 Maps	Map 94: Highest erosion risk land (Woody vegetation	Oppose	Concerned with the accuracy of the mapping proposed for highest erosion risk land, particularly highest erosion risk land (woody vegetation), which currently includes land within the active Belmont Quarry as shown on map in Appendix 2 of	Update mapping with accurate and evidence-based mapping, or delete definitions and retain existing definition of "erosion prone land" as shown below: **Erosion prone land** **The pre-existing slope of the land exceeds 20 degrees.**

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		clearance) - Te Whanganui-a-Tara.		submission. Seeks the mapping to be revised or removed entirely.	

S255 Woodridge Holdings Ltd

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S255.001	General comments	General comments - consultation	Oppose	Concerned with lack of consultation with key landowners and the development community during the preparation of PC1.	Withdraw PC1 and consult all relevant parties before releasing a replacement.
S255.002	General comments	General comments - overall	Oppose	Little or no consideration of NPS-UD which has equal status and there is a disjoint between the outcomes being sought by the Territorial Authorities actively promoting development as required by the NPS-UD and the restrictive approach WRC is proposing via PC1.	Withdraw PC1 and review and amend all provisions in light of this issue.
S255.003	General comments	General comments - overall	Oppose	Considers PC1 uses vague language like "where practicable" which lacks clarity as to when stormwater treatment systems will and won't be required.	Review all provisions to remove or eliminate vague language.
S255.004	General comments	General comments - overall	Oppose	Considers PC1 repeats the same objectives, policies and rules with a different heading for a different catchment and this is an unnecessary complication Suggests a set of objectives, policies and rules which apply to all catchments and supplementary ones where a specific objective, policy or rule as necessary for a specific catchment.	Withdraw PC1, review all objectives, policies and rules and remove all duplications by combining them wherever possible.
S255.005	General comments	General comments - stormwate	Oppose	Considers the long-term operational, maintenance and ownership requirements of the stormwater treatment system needed to be considered and determined before PC1 was notified, due to legal	Withdraw PC1 and review and amend all provisions in light of this issue.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		r management		effect upon being released. Concerns about uncertainty whether the relevant TA will accept discharges into their existing systems or if they will approve extensions to those systems to accommodate additional development. Considers technical and legal issues would arise if TA's require all new sections of stormwater main to be held in private ownership and maintained by the upstream property owners.	
S255.006	General comments	General comments - stormwater management	Oppose	Concerned that TA's will not allow discharges to their network if there is risk that the discharge could make them breach the PC1 requirements in relation to their network.	Withdraw PC1 and review all provisions in light of this issue and amend so that TA's are required to accept a discharge which meets the specified standards a permitted activity or has an appropriate GW resource consent.
S255.007	General comments	General comments - urban development	Oppose	Notes that PC1 does not include a Water Sensitive Urban Design Guide and so Council is asking developers via PC1 to implement measures into developments which it has not considered and provided guidance on. Considers this document should be prepared at the same time or before PC1 as typical water sensitive urban design measures are not going to work in large parts of the region due to the topography and the nature of the underlying material. Considers the approach makes it difficult for applicants to know what is likely to be acceptable under the rules and will result in a huge waste of time and resources for all parties involved.	Withdraw PC1, review it and release it again when the Water Sensitive Urban Design Guide has also been prepared, in consultation with the relevant stakeholders.
S255.008	12 Schedules	Schedule 30: Financial Contributions.	Not Stated	Opposes Schedule 30 and all objectives, policies and rules requiring a financial contribution and considers these an additional tax upon greenfield development. Notes PC1 makes several references to improving water quality. Resource consents are assessed in terms of their effects on the environment being "less than minor", "minor" or "more than minor". While positive effects can be used to offset negative	Schedule 30 and all objectives, policies and rules requiring a financial contribution be deleted.

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				adverse effects and s108(10) provides for financial contributions for the purpose of ensuring positive effects on the environment to offset any adverse effect, there is no requirement for the effects of a development upon the environment to be positive. Considers that development where the effects is less than minor should be consented, and that the contribution will flow through to house prices and contribute housing unaffordability.	
S255.009	2 Interpretation	Earthworks	Amend	Not stated	The second definition "For all other whaitua"/catchments should apply across the entire region. Add additional exclusions for activities as appropriate.
S255.010	2 Interpretation	Erosion and sediment management plan	Amend	Notes there are definitions for plantation forestry and vegetation clearance on highest erosion risk land, but no definition associated with earthworks generally.	Add a definition for an erosion and sediment control plan for general earthworks.
S255.011	2 Interpretation	Existing wastewater discharge	Amend	Considers one definition to two catchments and a different definition to all other catchments is inequitable and confusing.	Apply one definition to the entire region.
S255.012	2 Interpretation	Impervious surfaces	Amend	Notes inconsistencies including porous or permeable paving which is permeable and is specifically excluded from the definition of impervious surfaces, when compacted metal is excluded. However, porous, or permeable paving, has to sit on top of a subgrade of compacted metal/gravel so that it does not settle over time. Questions if roof areas with rainwater collection and reuse, and any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed), are the same thing Notes that the 10,000 Ltr stormwater reuse tanks required by the KCDC District Plan are not designed to attenuate stormwater flows but to alleviate water supply issues and would have little impact upon stormwater flows.	Remove, "roof areas with rainwater collection and reuse" and "any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)" from the exclusions and add "roof areas with rainwater attenuation" and "any impervious surfaces directed to a rainwater detention device" to the exclusion.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Considers a dedicated stormwater attenuation tank will empty over time and a level of attenuation for all rainfall events.	
S255.013	2 Interpretation	Mechanical land preparation	Amend	Considers the approach to the definition is inconsistent with that for National Threatened freshwater species as it requires the reader to look up the National Environmental Standards for Plantation Forestry. Either they are referenced which requires people to look them up or they are referenced and the definition included. Suggests including a hyperlink to the definition in the referenced document.	Consistency in the way all definitions are referenced.
S255.014	2 Interpretation	Redevelopment	Amend	Considers the definition of redevelopment should not include the word redevelopment as that is what is being defined. Notes the definition uses the words "existing urbanized property" and "brownfield development" but does not define what these are. Suggests it will be hard to know what is an "upgrade" and what is minor maintenance. Suggests existing developments have consent or existing use rights and should have the right to replace existing hard surfaces without the need for resource consent and replacing an existing drive, where no household unit's or EHU'S are proposed is not a redevelopment but maintenance and the same applies to Councils' roads and other hard surfaces and infrastructure. It they are not being widened or lengthened and the surface area is the same or very similar then this is not redevelopment.	Amend definition along the following lines:
S255.015	2 Interpretation	Stabilisation	Amend	Considers applying a definition to part of the region and nothing to the rest is inequitable and confusing. The definition should acknowledge that some areas inherently stable without the need to measures to be undertaken, eg.: exposed rock surfaces.	Provide one definition for the entire region. Amend to acknowledge that some areas are inherently stable and as such do not require stabilisation.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S255.016	2 Interpretation	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)	Amend	Either they are referenced which requires people to look them up or they are referenced and the definition included. Suggests including a hyperlink to the definition in the referenced document.	Consistency in the way all definitions are referenced.
S255.017	3 Objectives	Objective O2	Amend	Notes the objectives refers to improving water quality. Resource consents are assessed in terms of their effects on the environment being "less than minor", "minor" or "more than minor". While positive effects can be used offset negative adverse effects and s108(10) provides for financial contributions for the purpose of ensuring positive effects on the environment to offset any adverse effect, there is no requirement for the effects of a development upon the environment to be positive.	All objectives and polies and rules should be reviewed and rewritten so that it is clear that improvements in water quality are not required but are encouraged.
S255.018	4 Policies	Policy P30: Biodiversity, aquatic ecosystem health and mahinga kai.	Amend	Suggests policy is missing words, uses vague words and cannot be complied with if there are any indigenous aquatic species and indigenous birds present.	Amend wording "Manage the adverse effects of use and development **[of land]** on biodiversity, aquatic ecosystem health and mahinga kai to: ..." and be more specific by removing the words "where practical" as they are vague. The wording or Item (e) relates to "Critical habitat for indigenous aquatic species and indigenous birds". But the wording covers every situation, not just "critical" ones such as breading and migration. As a result, if there is any indigenous aquatic species or bird species in the area compliance cannot be achieved. It also uses the vague wording "where practical."
S255.019	5.4 Beds of lakes and rivers	Rule R151A: Ongoing diversion of a river -	Amend	Considers the rule is overly complicated and does not see the reason for differentiating between existing diversions associated with a structure and existing diversions which do not include structures, or the need to differentiate between diversions consented before or after PC1 became operative.	Rule R151A: Ongoing diversion of a river - permitted activity **An existing permanent diversion, that was lawfully established by way of a resource consent is a permitted activity [provided] all of the conditions of the resource consent which lawfully established the diversion have been complied with.**

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		permitted activity.		Seeks for clause (a) the words "as at the date of this rule becoming operative" should be deleted, and a specific date inserted as the date at which the rule becomes operative will be harder to determine as time progresses. This change should be made where ever this or a similar reference is used.	Delete all use of the words "as at the date of this rule becoming operative" in PC1 and insert a specific date.
S255.020	6 Other methods	Method M36: Freshwater Action Plan programme.	Oppose	Considers that FAPs should be developed by WRC in consultation with all stakeholders. Concerned the method gives Council the ability to amend the FAP without formal consultation with the relevant community and considers formal consultation with all stakeholders, the catchment community and TA should be compulsory before any changes are made to a FAP.	Amend this and all other methods so that FAPs cannot be developed or amended without formal engagement of the relevant stakeholders, including relevant landowners, catchment communities and TAs.
S255.021	6 Other methods	Method M37: Freshwater Action Plan for the Parangarahu Lakes.	Amend	Notes the method does not mention formal consultation with the relevant catchment communities, territorial authorities (TA's) and stakeholders (including landowners).	Amend this and all other methods so that FAPs cannot be developed or amended without formal engagement of the relevant stakeholders, catchment communities and TAs.
S255.022	6 Other methods	Method M38: Freshwater Action Plan for the Rangituhi catchment.	Amend	Notes the method does not mention formal consultation with the relevant catchment communities, territorial authorities (TA's) and stakeholders (including landowners).	Amend this and all other methods so that FAPs cannot be developed or amended without formal engagement of the relevant stakeholders, catchment communities and TAs.
S255.023	6 Other methods	Method 39: Freshwater Action Plan for Nationally Threatene	Amend	Notes the method does not mention formal consultation with the relevant catchment communities, territorial authorities (TA's) and stakeholders (including landowners).	Amend this and all other methods so that FAPs cannot be developed or amended without formal engagement of the relevant stakeholders, catchment communities and TAs.

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		d freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.			
S255.024	6 Other methods	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	Notes that formal consultation with the relevant catchment communities, TA's and stakeholders in the development of Fish passage Action Plan (FPAP is not mentioned.	Amend this and all other methods so that FAPs cannot be developed or amended without formal engagement of the relevant stakeholders, catchment communities and TAs.
S255.025	8 Whaitua Te Whanganui-a-Tara	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Amend	Notes that formal consultation with the relevant catchment communities, TA's and stakeholders in the development of Fish passage Action Plan (FPAP is not mentioned.	Amend this and all policies so that FAPs cannot be developed or amended without formal engagement of the relevant stakeholders, catchment communities and TAs.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S255.026	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	Amend	Suggests wording of "where practicable" provides no clarity as to when stormwater treatment systems will and won't be required.	Remove the words "where practical" and be more specific.
S255.027	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Amend	Considers P.P11 is an exact replica of WH.P11.	Combine provisions.
S255.028	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Oppose	Considers "to the extent practicable" is vague and provides no clarity as to when stormwater treatment systems will and won't be required. Item (a)(i) requires 85% of the mean annual runoff volume of stormwater to be treated but no allowance is provided for treating to a higher level, where that is possible. Considers this encourages people to do the minimum but incentivising through rates relief or reduced financial contribution payments could result in a higher level of treatment. Item (a) (ii) requires the installed stormwater treatment systems to "achieve copper and zinc load reductions factors equivalent to that of a raingarden. Bioretention device". but the targeted reduction for sediment zinc and copper in Tables 9.3 is 40% and Table 1 in Schedule 28: Stormwater Containment Treatment shows a 90% reduction. So Item (a) (ii) is	Remove all vague wording and/or advise what "to the extent practicable" means. Provide incentives for treating more than 85% of the mean annual runoff volume of stormwater. Reduce the targeted reduction in copper and zinc per site to 40% or provide some form of financial compensation of achieving a higher treatment rate. Make the wording of (a)(ii) clear by specifying the percentage reduction required for copper and zinc rather than referring to reductions equivalent to a rain garden.

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				in effect seeking a 90% reduction in copper and zinc discharges from a site to achieve the goal of reducing instream concentrations by 40%. Considers a 90% reduction of a site is onerous and as it is a larger reduction than necessary to achieve the goal in relation to the site. Considers development achieving more than a 40% reduction as required for their property should be compensated via rates relief or reductions in any financial contributions payable.	
S255.029	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Oppose	WH.P14(a)(i) requires 85% of the mean annual runoff volume of stormwater to be treated. No allowance is provided for treating to a higher level, where that is possible. Considers this encourages people to do the minimum but incentivising through rates relief or reduced financial contribution payments could result in a higher level of treatment.	Provide incentives for treating more than 85% of the mean annual runoff volume of stormwater.
S255.030	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Oppose	Notes this policy is implemented through a new rule that would make landowners unable to apply for a resource consent as such an activity is proposed to be prohibited which they consider effectively ring-fences the City. Considers it unlikely that GWRC would support a plan change application and this approach flies in the face of the local authorities' responsibility to provide for their own growth, and is a back-door way of achieving a very specific and unreasonable stormwater management approach.	Delete policy
S255.031	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of	Oppose	Considers the policy is not effects based as not every earthworks project over 3,000m2 will have negative adverse effects if works are underway between 1 June and 30 September. Considers each job should be treated on its merits and conditioned accordingly.	Delete policy

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		earthworks.			
S255.032	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Oppose	Considers this ignores landowners existing use rights, noting that redeveloping a site without increasing the level of impervious surfaces than there would be no additional adverse effects upon the environment and the development should not have to provide any hydrological controls or additional treatment. Questions if this rule is relevant to sites which have >1,000m2 of impervious surfaces before redevelopment and <1,000m2 of impervious surfaces after development. Considers item (c)(ii) does not align with WWL Acceptable Solution V4 which requires rainwater tanks for new roof areas >40m2 (Table 1-1).	Remove all requirements to provide hydrological controls the area of impervious surfaces is reduced as part of a development. Align clause (c)(ii) with WWL Acceptable Solution V4 by increasing the area specified to 40m2.
S255.033	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Oppose	Notes that under WH.R5 the creation of new (ie: greenfield), or redevelopment of existing impervious areas of less than 1,000m2 are permitted provided the conditions are met and under WH.R7 the creation of new (ie: greenfield), or redevelopment of existing impervious areas between 1,000m2 and 3,000m2 are controlled provided the conditions are met. However under Rule WH.R6 the creation of new impervious surfaces (ie: Greenfield Development) of between 1,000m2 and 3,000m2 are controlled provided the conditions are met. Therefore two controlled activity rules apply to Greenfield Developments where 1,000m2 and 3,000m2 of impervious surfaces are created. Controlled Rule WH.R6 at item (b) references permitted Rule WH.R6, notes a rule referring to itself makes no sense and the permitted rule is WH.R5. Matters for Control refer to "best practical option" and require 85% treatment.	Remove all requirements to provide hydrological controls if the area of impervious surfaces is reduced as part of a development. Align clause(c)(ii) with WWL Acceptable Solution V4 by increasing the area specified to 40m2.
S255.034	8 Whaitua Te	Rule WH.R7:	Amend	Considers rule uses vague wording and is unclear what "best practicable option" means.	Remove all vague wording and/or advise what "best practicable option" means.

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	Whanganui-a-Tara	Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.			Provide incentives for treating more than 85% of the mean annual runoff volume of stormwater.
S255.035	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Amend	Not stated.	Provide incentives for treating more than 85% of the mean annual runoff volume of stormwater.
S255.036	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Oppose	Notes that under the RMA, to develop land for a land use it is not currently zoned for can be progressed either via a plan change or via a resource consent application. Considers making stormwater discharges from unplanned greenfield developments prohibited is excessive and is not necessary to ensure that the potential adverse effects of developing these areas are appropriately considered. Suggests making them a discretionary activity would result in all such land use needing a WRC resource consent and the potential adverse effects of these development upon the environment can be considered via that consent.	Amend so that unplanned greenfield developments area a discretionary activity.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S255.037	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Oppose	Considers it will not be possible to comply with these rules as their conditions specify that there should be no discharge of sediment and suggests the majority small scale earthworks which are currently permitted would need a consent to ensure compliance is not an issue. Concern about GW resourcing to accommodate the costs generated by PC1. Considers WRC's own ESCP Guidelines don't consider or provide solutions for the level of treatment required, which is greater than that of a permitted stormwater discharge. Notes that as a result of these rules, the pre-earthworks development is allowed to discharge a prescribed level of SS and the post-development site is allowed to discharge a prescribed level of SS but the development phase is not allowed any, and topography and permeability in Wellington and Porirua makes treatment difficult.	Withdraw and redraft PC1 or amend Rules WH.R23 and P.P22 so that they allow an appropriate level of SS in any stormwater discharge. 50g/m3 to Schedule A sites and 100g/m3 to any other water body are noted in WH.R3 (notes these levels may need to be amended following submission by experts in this field).
S255.038	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	Considers in most cases it will not be possible to comply with Items (c)(1v) and (c)(v) of Rule WH.R23 as they specify that there should be no discharge of sediment and therefore nearly all small scale earthworks which are currently permitted would require a WRC consent. Notes the rule requires a level of treatment that is greater than that permitted under WH.R3. Notes the pre-earthworks development is allowed to discharge a prescribed level of SS and the post-development site is allowed to discharge a prescribed level of SS but the development phase is not allowed any, and topography and permeability in Wellington and Porirua makes treatment difficult. Notes the GWRC Guidelines referenced in the note below this rule are note designed to achieve "no discharge of sediment" but none of the measures specified, even the sediment retention ponds can be guaranteed to remove all sediment.	Amend Items (c)(1v) and (c)(v) so that they allow an appropriate level of SS ion any stormwater discharge. 50g/m3 to Schedule A sites and 100g/m3 to any other water body are noted in WH.R3 (notes these levels may need to be amended following submission by experts in this field).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S255.039	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	Notes whilst there is greater potential for earthworks to have negative adverse effects during the winter period between 1 June and 30 September it does not automatically follow that all earthworks underway during this period will have negative effects. Considers each job should be treated on its merits and conditioned accordingly, and one of the matters for discretion under this rule is the "timing of the works". Notes the matter for discretion, "The proportion of unestablished land in the catchment.", is vague and gives an applicant no idea what % of disturbance is likely to be acceptable per catchment and makes the applicant reliant upon the actions of others. Questions if the % limit for a catchment is exceeded because there are multiple developments in the area, how does Council decide who goes first? Considers this could cause a trade competition issue.	Delete WH.R24(b) Provide guidance as to the % of a catchment which can be developed at onetime and guidance as to how "The proportion of unestablished land in the catchment." matter for discretion will work.
S255.040	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	Item P.P2(b) is "encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and", but the rules do not 'encourage' redevelopments to reduce urban contaminant loads they 'require' it.	Amend all rules so that they 'encourage' and do not 'require' developments to reduce urban contaminant loads in accordance with this policy.
S255.041	9 Te Awarua-o-Porirua Whaitua	Policy P.P3: Freshwater Action Plans role in the health and	Amend	Notes the method does not mention formal consultation with the relevant catchment communities, territorial authorities (TA's) and stakeholders (including landowners).	Amend this and all other policies so that FAPs cannot be developed or amended without formal engagement of the relevant stakeholders, catchment communities and TAs.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		wellbeing of waterways .			
S255.042	9 Te Awarua-o-Porirua Whaitua	Policy P.P6: Point source discharges .	Oppose	Notes that P.P6(a) states that "any new discharge is inappropriate if contaminants in the discharge would cause the affected freshwater body to decline in relation to the target attribute state(s) for that part Freshwater Management Unit(s) and/or coastal water objective(s)" and questions if the policy is contrary to the rules as a permitted discharge under Rule WH.R5 and any discharge requiring a consent may in a very small way result in a decline in relation to the target attribute state(s) even if only for a small section of the water body. Notes P.P6(b)(i) refers to "upgrading the discharge" while P.P6(c)(i) refers to "improving the discharge" and suggests consistent terminology should be used. P.P6(b)(i) relates to existing point source discharges where TASs are met and states that they are only appropriate if a resource consent includes a defined programme of work for upgrading the discharge. Considers it is not clear if this relates to land development, for example does a developer who is discharging to the TA network have to upgrade the TA network so that the quality of the discharge is improved? Questions if that is the case will the TA just refuse to accept any additional inputs, even if they comply with WH.R4 for not meeting the discharge standards. Considers this will lead to development ceasing and increased property prices. The same question applies to P.P6(c) relating to	Amend the policy so that developments do not automatically contravene it even if permitted. Use consistent understandable terminology. Clarify the applicability of the policy.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				existing point source discharges where TASs are not met.	
S255.043	9 Te Awarua-o-Porirua Whaitua	Policy P.P7 Discharges to groundwater.	Oppose	Considers this policy and specifically the words "shall not degrade the quality of groundwater" cannot be complied with as all stormwater discharges include some level of contamination and as so this policy would be contravened.	Amend the policy so that it can be met.
S255.044	9 Te Awarua-o-Porirua Whaitua	Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Amend	Considers this is an exact replica of WH.P9 and could be rewritten into one policy.	Delete and rewrite into one policy.
S255.045	9 Te Awarua-o-Porirua Whaitua	Policy P.P10: Managing adverse effects of stormwater discharges.	Amend	Considers P.P10(a) and P.P10(c) are covering the same ground and both also use vague wording such as "to the extent practicable" and "where practicable".	Review to simplify and remove vague wording or provide a definition for "to the extent practicable" and "where practicable".
S255.046	9 Te Awarua-o-Porirua Whaitua	Policy P.P12: Managing stormwater network discharges through a Stormwater	Amend	Notes that P.P12(a) specifies a 15% reduction in copper in discharges and a 40% discharge in zinc to the coastal water management units of Onepoto Arm and Pāuatahanui Inlet but considers this is inconsistent with Table 9.3 which specifies 40% reduction for both.	Fix this inconsistency and review PC1 for other similar inconsistencies.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Management Strategy.			
S255.047	9 Te Awarua-o-Porirua Whaitua	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Oppose	Policy supports the associated rule that 85% of mean annual runoff volume from new impervious surfaces must be treated which is considered to be excessive and unreasonable.	Delete policy
S255.048	9 Te Awarua-o-Porirua Whaitua	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Oppose	Notes this policy is implemented through a new rule that would make landowners unable to apply for a resource consent as such an activity is proposed to be prohibited which they consider effectively ring-fences the City. Considers it unlikely that GWRC would support a plan change application and this approach flies in the face of the local authorities' responsibility to provide for their own growth, and is a back-door way of achieving a very specific and unreasonable stormwater management approach.	Delete policy
S255.049	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Not Stated	Notes this policy is implemented through a new rule that would make landowners unable to apply for a resource consent as such an activity is proposed to be prohibited which they consider effectively ring-fences the City. Considers it unlikely that GWRC would support a plan change application and this approach flies in the face of the local authorities' responsibility to provide for their own growth, and is a back-door way of achieving a very specific and unreasonable stormwater management approach.	Delete policy
S255.050	9 Te Awarua-	Policy P.P28:	Amend	This policy relates to the discharge standards for earthworks sites and makes reference to discharge	We request the Policy be amended to refer to an NTU standard.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	Discharge standard for earthworks sites.		standard for turbidity to be measured using a new method of Total Suspended Solids. Notes this test requires a laboratory to measure and cannot readily be done in the field.	
S255.051	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose	Considers the policy is not effects based as not every earthworks project over 3,000m2 will have negative adverse effects if works are underway between 1 June and 30 September. Considers each job should be treated on its merits and conditioned accordingly.	Delete policy
S255.052	9 Te Awarua-o-Porirua Whaitua	Rule P.R2: Stormwater to land - permitted activity.	Amend	Considers P.R2 repeats WH.R2 and as such is unnecessary.	Combine into one rule. If it is not, comments regarding WH.R2 apply.
S255.053	9 Te Awarua-o-Porirua Whaitua	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Amend	Considers P.R3 repeats WH.R3 and as such is unnecessary.	Combine into one rule. If it is not, comments regarding WH.R3 apply.
S255.054	9 Te Awarua-o-Porirua Whaitua	Rule P.R4: Stormwater from an existing high risk industrial or trade premise -	Amend	Considers P.R4 repeats WH.R4 and as such is unnecessary.	Combine into one rule. If it is not, comments regarding WH.R4 apply.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
S255.055	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Considers P.R5 repeats WH.R5 and as such is unnecessary.	Combine into one rule. If it is not, comments regarding WH.R5 apply.
S255.056	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Considers P.R6 repeats WH.R6 and as such is unnecessary.	Combine into one rule. If it is not, comments regarding WH.R6 apply.
S255.057	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas- controlled activity.	Amend	Considers P.R7 repeats WH.R7 and as such is unnecessary. Notes that (b) refers to activities permitted under P.R6 when P.R5 is the permitted rule.	Combine into one rule. If it is not, comments regarding WH.R7 apply.
S255.058	9 Te Awarua-o-Porirua Whaitua	Rule P.R8: Stormwater from a local authority	Amend	Considers P.R8 repeats WH.R9 and as such is unnecessary.	Combine into one rule. If it is not, comments regarding WH.R9 apply.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		or state highway network-restricted discretionary activity.			
S255.059	9 Te Awarua-o-Porirua Whaitua	Rule P.R9: Stormwater from new state highways-discretionary activity.	Amend	Considers P.R9 repeats WH.R10 and as such is unnecessary.	Combine into one rule. If it is not, comments regarding WH.R10 apply.
S255.060	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Amend	Considers P.R10 repeats WH.R11 and as such is unnecessary.	Combine into one rule. If it is not, comments regarding WH.R11 apply.
S255.061	9 Te Awarua-o-Porirua Whaitua	Rule P.R11: All other stormwater discharges - non-complying activity.	Amend	Considers P.R11 repeats WH.R12 and as such is unnecessary.	Combine into one rule. If it is not, comments regarding WH.R12 apply.
S255.062	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges	Amend	Considers P.R12 repeats WH.R13 and as such is unnecessary.	Combine into one rule. If it is not, comments regarding WH.R13 apply.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		from new unplanned greenfield development - prohibited activity.			
S255.063	9 Te Awarua-o-Porirua Whaitua	Rule P.R13: Wastewater network catchment discharges to water - restricted discretionary activity.	Amend	Considers P.R13 repeats WH.R14 but with a better layout.	Combine into one rule.
S255.064	9 Te Awarua-o-Porirua Whaitua	Rule P.R14: Existing wastewater discharges from a treatment plant to coastal and freshwater - discretionary activity.	Amend	Considers P.R14 repeats WH.R15 but with a slightly different heading.	Combine into one rule Delete and amend WH.R14 to include the P.R13 format.
S255.065	9 Te Awarua-o-Porirua Whaitua	Rule P.R15: All other discharges of wastewate	Amend	Considers P.R15 repeats WH.R16 and as such is unnecessary.	Combine into one rule.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		r - non-complying activity.			
S255.066	9 Te Awarua-o-Porirua Whaitua	Rule P.R16: Vegetation clearance on highest erosion risk land-permitted activity.	Amend	Considers P.R16 repeats WH.R17 and should be deleted.	Combine into one rule.
S255.067	9 Te Awarua-o-Porirua Whaitua	Rule P.R17: Vegetation clearance on highest erosion risk land - controlled activity.	Amend	Considers P.R17 repeats WH.R18 and as such is unnecessary.	Combine into one rule.
S255.068	9 Te Awarua-o-Porirua Whaitua	Rule P.R18: Vegetation clearance - discretionary activity.	Amend	Considers P.R17 repeats WH.R18 and as such is unnecessary.	Combine into one rule.
S255.069	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry - controlled activity.	Amend	Considers P.R19 repeats WH.R20 and should be deleted.	Combine into one rule.
S255.070	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry -	Amend	Considers P.R20 repeats WH.R21 and as such is unnecessary.	Combine into one rule.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discretionary activity.			
S255.071	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity.	Amend	Considers P.R21 repeats WH.R22 and as such is unnecessary.	Combine into one rule.
S255.072	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Oppose	See submission point on rule WH.R23.	See submission point on rule WH.R23.
S255.073	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Amend	Considers P.R22 repeats WH.R23 and as such is unnecessary.	Combine into one rule. If it is not, comments regarding WH.R23 apply.
S255.074	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Amend	Considers P.R23 repeats WH.R24 and as such is unnecessary.	Combine into one rule. If it is not, comments regarding WH.R24 apply.
S255.075	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks - non-complying activity.	Amend	Considers P.R24 repeats WH.R25 and as such is unnecessary.	Combine into one rule. If it is not, comments regarding WH.R25 apply.
S255.076	9 Te Awarua-	Rule P.R25:	Amend	Considers P.R245repeats WH.R26 and as such is unnecessary.	Combine into one rule.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	Farming activities on properties of between 4 hectares and 20 hectares - permitted activity.			
S255.077	9 Te Awarua-o-Porirua Whaitua	Rule P.R26: Farming activities on 20 hectares or more of land - permitted activity.	Amend	Considers P.R26 repeats WH.R27 and should be deleted.	Combine into one rule.
S255.078	9 Te Awarua-o-Porirua Whaitua	Rule P.R27: The use of land for farming activities - discretionary activity.	Amend	Considers P.R27 repeats WH.R30 and should be deleted.	Combine into one rule.
S255.079	9 Te Awarua-o-Porirua Whaitua	Rule P.R28: Change of rural land use - discretionary activity.	Amend	Considers P.R28 repeats WH.R31 and should be deleted.	Combine into one rule.
S255.080	9 Te Awarua-	Rule P.R29:	Amend	Considers P.R29 repeats WH.R32 and should be deleted.	Combine into one rule.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	Farming activities - non-complying activity.			
S255.081	12 Schedules	Schedule A: Outstanding water bodies	Amend	Considers unnamed streams in all schedules be given a reference and mapped, including provision of a hyperlink to the coordinates, so that the location can be more readily identified. Considers it not sufficient to state coordinates alone. Considers all streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are, noting not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info.	Provide a reference and map all unnamed streams in all schedules and include the provision of a hyperlink to the coordinates. Map and provide a hyperlink to all streams with names.
S255.082	12 Schedules	Schedule A2: Lakes with outstanding indigenous ecosystem values.	Amend	Considers unnamed streams in all schedules be given a reference and mapped, including provision of a hyperlink to the coordinates, so that the location can be more readily identified. Considers it not sufficient to state coordinates alone. Considers all streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are, noting not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info.	Provide a reference and map all unnamed streams in all schedules and include the provision of a hyperlink to the coordinates. Map and provide a hyperlink to all streams with names.
S255.083	12 Schedules	Schedule F: Ecosystems and habitats with significant indigenous	Amend	Considers unnamed streams in all schedules be given a reference and mapped, including provision of a hyperlink to the coordinates, so that the location can be more readily identified. Considers it not sufficient to state coordinates alone. Considers all streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are, noting not	Provide a reference and map all unnamed streams in all schedules and include the provision of a hyperlink to the coordinates. Map and provide a hyperlink to all streams with names.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		biodiversity values.		everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info.	
S255.084	12 Schedules	Schedule F1: Rivers and lakes with significant indigenous ecosystems.	Amend	Considers unnamed streams in all schedules be given a reference and mapped, including provision of a hyperlink to the coordinates, so that the location can be more readily identified. Considers it not sufficient to state coordinates alone. Considers all streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are, noting not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info.	Provide a reference and map all unnamed streams in all schedules and include the provision of a hyperlink to the coordinates. Map and provide a hyperlink to all streams with names.
S255.085	12 Schedules	Schedule F2a: Significant habitats for indigenous birds in rivers.	Amend	Considers unnamed streams in all schedules be given a reference and mapped, including provision of a hyperlink to the coordinates, so that the location can be more readily identified. Considers it not sufficient to state coordinates alone. Considers all streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are, noting not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info.	Provide a reference and map all unnamed streams in all schedules and include the provision of a hyperlink to the coordinates. Map and provide a hyperlink to all streams with names.
S255.086	12 Schedules	Schedule F2b: Significant habitats for indigenous birds in lakes.	Amend	Considers unnamed streams in all schedules be given a reference and mapped, including provision of a hyperlink to the coordinates, so that the location can be more readily identified. Considers it not sufficient to state coordinates alone. Considers all streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are, noting not everyone knows individual stream names and	Provide a reference and map all unnamed streams in all schedules and include the provision of a hyperlink to the coordinates. Map and provide a hyperlink to all streams with names.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				where they are and it can be difficult to determine their locations using the available online info.	
S255.087	12 Schedules	Schedule F2c: Significant habitats for indigenous birds in the coastal marine area.	Amend	Considers unnamed streams in all schedules be given a reference and mapped, including provision of a hyperlink to the coordinates, so that the location can be more readily identified. Considers it not sufficient to state coordinates alone. Considers all streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are, noting not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info.	Provide a reference and map all unnamed streams in all schedules and include the provision of a hyperlink to the coordinates. Map and provide a hyperlink to all streams with names.
S255.088	12 Schedules	Schedule F4: Sites with significant indigenous biodiversity values in the coastal marine area.	Amend	Considers unnamed streams in all schedules be given a reference and mapped, including provision of a hyperlink to the coordinates, so that the location can be more readily identified. Considers it not sufficient to state coordinates alone. Considers all streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are, noting not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info.	Provide a reference and map all unnamed streams in all schedules and include the provision of a hyperlink to the coordinates. Map and provide a hyperlink to all streams with names.
S255.089	12 Schedules	Schedule F5: Habitats with significant indigenous biodiversity values in the coastal marine area.	Amend	Considers unnamed streams in all schedules be given a reference and mapped, including provision of a hyperlink to the coordinates, so that the location can be more readily identified. Considers it not sufficient to state coordinates alone. Considers all streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are, noting not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info.	Provide a reference and map all unnamed streams in all schedules and include the provision of a hyperlink to the coordinates. Map and provide a hyperlink to all streams with names.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S255.090	12 Schedules	B Freshwater Action Plan requirements.	Amend	Considers that FAPs should be developed by WRC in consultation with all stakeholders	Amend so that all stakeholders are recognised as being important to the development and implementation of FAP's.
S255.091	12 Schedules	B3 Necessary actions.	Amend	Questions about rates relieve to treating more than 85% of your stormwater or retiring and planting areas which are not considered to be the highest risk erosion prone land but which still contribute sediment to the water bodies eg.: former forestry land or riparian areas.	Consider rates relief and other forms of financial support for a wider range of actions which will improve water quality.
S255.092	12 Schedules	Table 1: Target load Reductions for Copper and Zinc	Oppose	Notes the target load reductions for Coper and Zinc in Table 1 are 90 but the targeted reduction for zinc and copper in Tables 9.3 is 40%. Considers a 90% reduction of a site is onerous and as it is a larger reduction than necessary to achieve the goal in relation to the site. Considers development achieving more than a 40% reduction as required for their property should be compensated via rates relief or reductions in any financial contributions payable.	Reduce the targeted reduction in copper and zinc per site to 40% or provide some form of financial compensation of achieving a higher treatment rate.
S255.093	12 Schedules	Schedule 29: Stormwater Impact Assessments.	Oppose	Considers that as clause 8 requires specifies that SIA's need to include Cultural considerations to be informed by engagement with mana whenua, this makes consultation with Mana Whenua compulsory. Considers this is in conflict with the Clause 6(1)(f) of the Fourth Schedule of the RMA, and it should be amended so that it does not require consultation with mana whenua.	Amend this clause to that it is not in conflict with the RMA.
S255.094	12 Schedules	A Context	Amend	Considers the wording of the first paragraph referencing is slightly misleading. Notes it uses the word "may' but s10 states that "A108(10) a financial contribution unless-- (a) the condition is imposed in accordance with the purposes specified in the plan or proposed plan (including the purpose of ensuring positive effects on the environment to offset any adverse effect);	Amend text accordingly

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				and (b) the level of contribution is determined in the manner described in the plan or proposed plan." Notes while the NPS-FW requires water quality to be maintained or improved, s10 only requires "positive effects on the environment to offset any adverse effect" there is no requirement for overall effects to be positive and resource consents should be granted where the overall adverse effects of and application are less than minor.	
S255.095	12 Schedules	B Purpose	Oppose	Considers if brownfield development, which have existing use rights, are improving their discharges during redevelopment they should get a payment/rates reduction/credit.	Consider financial incentives for existing property owners who install water attenuation and or treatment devices.
S255.096	12 Schedules	C Definition of an Equivalent Household Unit	Oppose	Considers the paragraphs are confusing as there is no specific definition of what is average sized or a m2 size specified and this could vary from city to city. Notes the second paragraph talks about every 100m2 of non-residential development and new road/state highways (not directly sporting a greenfield development) being deemed to create one unit of impact and questions if 100m2 is one EHU or not.	Amend to provide clarity as to what is an EHU and what is not. Clarify how EHU are applied to hard surfaces that are not roofs eg.: roads, onsite paving and driveways, in all areas.
S255.097	12 Schedules	Tale D2. Financial contribution calculations for non-residential greenfield development and new roads/stat	Amend	Considers the financial contribution timing needs to be defined and notes paying all financial/development contributions up front for an entire development can make the development uneconomic, with TA financial/development contributions typically paid when a developer applies for s224c certification or when a building consent is to be issued. Considers the proposed financial contributions should only be payable when there is an impact to water quality. Considers there also needs to be a mechanism for these contributions to be refunded if they are paid	Consider and amend accordingly

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		e highways		and a development or building does not proceed or is not completed in its entirety.	
S255.098	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Concerned that TA's will not allow stormwater discharges to their networks in the future as even a complying discharge may result in compliance issues at the point of discharge from their network to a water body.	Provide clarity that TA's will have to accept complaint discharges or discharges approved via a NRP consent.
S255.099	13 Maps	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4).	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.
S255.100	13 Maps	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 1: (Kāpiti).	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S255.101	13 Maps	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 2: (Wellington Harbour).	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.
S255.102	13 Maps	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 2: Te Awarua-o-Porirua.	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.
S255.103	13 Maps	Map 77: Habitats of nationally threatened freshwater species - Te Awarua-o-Porirua	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and Te Whanganui-a-Tara (Schedule F1).			
S255.104	13 Maps	Map 78: Part freshwater management units and target attribute state sites (rivers) - Te Awarua-o-Porirua.	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.
S255.105	13 Maps	Map 79: Part freshwater management units and target attribute state sites (rivers) - Te Whanganui-a-Tara.	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.
S255.106	13 Maps	Map 80: Part freshwater management units and target attribute state sites (lakes) -	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Te Whanganui-a-Tara.			
S255.107	13 Maps	Map 81: Rivers and catchment management units for water takes - Te Awarua-o-Porirua.	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.
S255.108	13 Maps	Map 82: Coastal water management units - Te Awarua-o-Porirua.	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.
S255.109	13 Maps	Map 83: Coastal water management units - Te Whanganui-a-Tara.	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.
S255.110	13 Maps	Map 84: Harbour arm catchments - Te Awarua-o-Porirua.	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.
S255.111	13 Maps	Map 85: Primary contact	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly	Provide TA District Plan style online maps.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		sites - Te Whanganui-a-Tara.		where boundaries are relative to property boundaries.	
S255.112	13 Maps	Map 86: Unplanned greenfield areas - Porirua City Council.	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.
S255.113	13 Maps	Map 87: Unplanned greenfield areas - Wellington City Council.	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.
S255.114	13 Maps	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.
S255.115	13 Maps	Map 89: Unplanned greenfield areas - Hutt City Council.	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.
S255.116	13 Maps	Map 90: Highest and high erosion risk land (Pasture) - Te	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Awarua-o-Porirua.			
S255.117	13 Maps	Map 91: Highest erosion risk land (Woody vegetation) - Te Awarua-o-Porirua.	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.
S255.118	13 Maps	Map 92: Highest erosion risk land (Plantation forestry) - Te Awarua-o-Porirua.	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.
S255.119	13 Maps	Map 93: Highest and high erosion risk land (Pasture) - Te Whanganui-a-Tara.	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.
S255.120	13 Maps	Map 94: Highest erosion risk land (Woody vegetation clearance) - Te	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Whanganui-a-Tara.			
S255.121	13 Maps	Map 95: Highest erosion risk land (Plantation forestry) - Te Whanganui-a-Tara.	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.
S255.122	13 Maps	Map 96: Mākara catchment.	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.
S255.123	13 Maps	Map 97: Mangaroa catchment.	Amend	Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.	Provide TA District Plan style online maps.

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Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.001	General comments	General comments - overall	Support	Supports the direction of PC1	Not stated
S183.002	General comments	General comments – stormwater management	Support	Supports stronger environmental regulation of discharges into surface and coastal water bodies	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.003	General comments	General comments - water bodies	Support	Supports freshwater and coastal; water objectives within PC1	Not stated
S183.004	General comments	General comments - unplanned greenfield development	Support	Supports the need for less greenfield developments. Concerned that intensifying existing areas such as the Rongotai Isthmus may lead to increased flooding and stormwater discharge into Wellington Harbour and Lyall Bay.	Not stated
S183.005	2 Interpretation	Afforestation	Support	Not stated	Not stated
S183.006	2 Interpretation	Allocation amount	Support	Not stated	Not stated
S183.007	2 Interpretation	Annual stocking rate	Support	Not stated	Not stated
S183.008	2 Interpretation	Catchment management unit	Support	Not stated	Not stated
S183.009	2 Interpretation	Coastal water management units	Support	Not stated	Not stated
S183.010	2 Interpretation	Containment standard	Support	Not stated	Not stated
S183.011	2 Interpretation	Core allocation	Support	Not stated	Not stated
S183.012	2 Interpretation	Dry weather discharges	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.013	2 Interpretation	Earthworks	Support	Not stated	Not stated
S183.014	2 Interpretation	Effective hectares	Support	Not stated	Not stated
S183.015	2 Interpretation	Environmental outcomes	Support	Not stated	Not stated
S183.016	2 Interpretation	Erosion and sediment management plan	Support	Not stated	Not stated
S183.017	2 Interpretation	Erosion risk treatment plan	Support	Not stated	Not stated
S183.018	2 Interpretation	Existing wastewater discharge	Support	Not stated	Not stated
S183.019	2 Interpretation	Harbour arm catchments	Support	Not stated	Not stated
S183.020	2 Interpretation	Harvesting	Support	Not stated	Not stated
S183.021	2 Interpretation	High risk industrial or trade premise	Support	Not stated	Not stated
S183.022	2 Interpretation	Highest erosion risk land (plant	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		ation forestry)			
S183.023	2 Interpretation	Highest erosion risk land (pasture)	Support	Not stated	Not stated
S183.024	2 Interpretation	High erosion risk land (pasture)	Support	Not stated	Not stated
S183.025	2 Interpretation	Highest erosion risk land (woody vegetation)	Support	Not stated	Not stated
S183.026	2 Interpretation	Hydrological control	Support	Not stated	Not stated
S183.027	2 Interpretation	Impervious surfaces	Support	Not stated	Not stated
S183.028	2 Interpretation	Intensive grazing	Support	Not stated	Not stated
S183.029	2 Interpretation	Limit	Support	Not stated	Not stated
S183.030	2 Interpretation	Mechanical land preparation	Support	Not stated	Not stated
S183.031	2 Interpretation	Nationally threatened	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		freshwater species			
S183.032	2 Interpretation	Nitrogen discharge risk	Support	Not stated	Not stated
S183.033	2 Interpretation	Part Freshwater Management Unit	Support	Not stated	Not stated
S183.034	2 Interpretation	Primary contact sites	Support	Not stated	Not stated
S183.035	2 Interpretation	Recognised Nitrogen Risk Assessment Tool	Support	Not stated	Not stated
S183.036	2 Interpretation	Redevelopment	Support	Not stated	Not stated
S183.037	2 Interpretation	Registration	Support	Not stated	Not stated
S183.038	2 Interpretation	Registered forestry adviser	Support	Not stated	Not stated
S183.039	2 Interpretation	Replanting	Support	Not stated	Not stated
S183.040	2 Interpretation	Sacrifice paddocks	Support	Not stated	Not stated
S183.041	2 Interpretation	Small stream riparian	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		programme			
S183.042	2 Interpretation	Stabilisation	Support	Not stated	Not stated
S183.043	2 Interpretation	Stormwater	Support	Not stated	Not stated
S183.044	2 Interpretation	Stormwater catchment or sub-catchment	Support	Not stated	Not stated
S183.045	2 Interpretation	Stormwater management strategy	Support	Not stated	Not stated
S183.046	2 Interpretation	Stormwater network	Support	Not stated	Not stated
S183.047	2 Interpretation	Stormwater treatment system	Support	Agree that there are a large range low impact urban design stormwater treatment systems that should be used.	Not stated
S183.048	2 Interpretation	Stocking rate	Support	Not stated	Not stated
S183.049	2 Interpretation	Stock unit	Support	Not stated	Not stated
S183.050	2 Interpretation	Unplanned greenfield development	Support	Not stated	Not stated
S183.051	2 Interpretation	Vegetation clearance (for the	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)			
S183.052	2 Interpretation	Wastewater network catchment or sub-catchment	Support	Not stated	Not stated
S183.053	2 Interpretation	Wet weather overflows	Support	Not stated	Not stated
S183.054	2 Interpretation	Whaitua	Support	Not stated	Not stated
S183.055	2 Interpretation	Winter Stocking rate	Support	Not stated	Not stated
S183.056	3 Objectives	Objective O2	Support	Not stated	Not stated
S183.057	3 Objectives	Objective O5	Support	Not stated	Not stated
S183.058	3 Objectives	Objective O6	Support	Not stated	Not stated
S183.059	3 Objectives	Objective O17	Support	Not stated	Not stated
S183.060	3 Objectives	Objective O20	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.061	3 Objectives	Objective O34	Support	Not stated	Not stated
S183.062	3 Objectives	Objective O35	Support	Not stated	Not stated
S183.063	3 Objectives	Objective O36	Support	Not stated	Not stated
S183.064	3 Objectives	Objective O37	Support	Not stated	Not stated
S183.065	3 Objectives	Objective O38	Support	Not stated	Not stated
S183.066	3 Objectives	Objective O18: Rivers, lakes, natural wetlands and coastal water are suitable for contact recreation and Māori customary use.	Support	Not stated	Not stated
S183.067	3 Objectives	Table 3.1 Primary contact recreation and Māori customary use objectives	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		in freshwater bodies.			
S183.068	3 Objectives	Table 3.2 Secondary contact and Māori customary use recreation objectives in freshwater bodies.	Support	Not stated	Not stated
S183.069	3 Objectives	Table 3.3 Contact recreation and Māori customary use objectives in coastal water.	Support	Not stated	Not stated
S183.070	3 Objectives	Objective O19: Biodiversity, aquatic ecosystem health and mahinga kai in fresh water bodies and the coastal marine area are	Amend	Not stated	Amend Objective O19 as follows Objective O19 Biodiversity, aquatic ecosystem health and mahinga kai in freshwater bodies and the coastal marine area are safeguarded such that: (a) water quality, flows, water levels and aquatic and coastal habitats are managed to maintain**and improve biodiversity,** aquatic ecosystem health and mahinga kai, and (b) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a freshwater body or coastal marine area is meaningfully improved so that the objective is met within a reasonable timeframe, and (c) restoration of aquatic ecosystem health and mahinga kai is ~~encouraged.~~ **undertaken and required where land is**

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		safeguarded.			**developed that contains freshwater bodies.** Note For the purposes of this objective 'a reasonable timeframe' is a date for the applicable water body or coastal marine area inserted into this Plan through the plan change/s required by the RMA to implement the NPS-FM 2020, ~~or 2050~~ **2035** if no other date is specified by 31 December 2026.
S183.071	3 Objectives	Table 3.4 Rivers and Streams.	Amend	Not stated	Amend Table 3.4 as follows: Mahinga kai species, including taonga species, are present in quantities, size and of a quality that is ~~appropriate for the area~~ **in a healthy ecological state** and reflective of a healthy functioning ecosystem18 Huanga of mahinga kai as identified by mana whenua are achieved.
S183.072	3 Objectives	Table 3.5 Lakes.	Support	Not stated	Not stated
S183.073	3 Objectives	Table 3.6 Groundwater.	Support	Not stated	Not stated
S183.074	3 Objectives	Table 3.7 Natural wetlands.	Support	Not stated	Not stated
S183.075	3 Objectives	Table 3.8 Coastal waters.	Support	Not stated	Not stated
S183.076	3 Objectives	Objective O25: Outstanding water bodies identified in Schedule A (outstanding water bodies)	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and their significant values are protected and restored.			
S183.077	3 Objectives	Objective O28: Ecosystems and habitats with significant indigenous biodiversity values are protected from the adverse effects of use and development, and where appropriate restored to a healthy functioning state including as defined by Tables 3.4, 3.5, 3.6, 3.7 and 3.8.	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.078	4 Policies	Policy P65: National Policy Statement for Freshwater Management requirements for discharge consents.	Support	Not stated	Not stated
S183.079	4 Policies	Policy P70: Minimising effects of rural land use activities.	Support	Not stated	Not stated
S183.080	4 Policies	Policy P71: Managing the discharge of nutrients.	Support	Not stated	Not stated
S183.081	4 Policies	Policy P72: Priority Catchments.	Support	Not stated	Not stated
S183.082	4 Policies	Policy P73: Implementation of farm	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		environment plans in priority catchments.			
S183.083	4 Policies	Policy P74: Avoiding an increase in adverse effects of rural land use activities and associated diffuse discharges of contaminants.	Support	Not stated	Not stated
S183.084	4 Policies	Policy P76: Consent duration for rural land use in priority catchments.	Support	Not stated	Not stated
S183.085	4 Policies	Policy P77: Improving water quality for contact recreation	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and Māori customary use.			
S183.086	4 Policies	Policy P79: Quality of point source discharges to rivers.	Support	Not stated	Not stated
S183.087	4 Policies	Policy P82: Avoiding inappropriate discharges to water.	Support	Not stated	Not stated
S183.088	4 Policies	Policy P83: Minimising adverse effects of stormwater discharges.	Support	Not stated	Not stated
S183.089	4 Policies	Policy P84: Managing land use impacts on stormwater.	Support	Not stated	Not stated
S183.090	4 Policies	Policy P85: Development of a stormwate	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		r management strategy for first-stage local authority and state highway network consents.			
S183.091	4 Policies	Policy P86: Second-stage local authority and state highway network consents.	Support	Not stated	Not stated
S183.092	4 Policies	Policy P87: Minimising wastewater and stormwater interactions.	Support	Not stated	Not stated
S183.093	4 Policies	Policy P88: Assessing resource consents to discharge stormwater	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		containing wastewater.			
S183.094	4 Policies	Policy P118: Water takes at minimum flows and minimum water levels.	Support	Not stated	Not stated
S183.095	4 Policies	Policy P121: Core allocation for rivers.	Support	Not stated	Not stated
S183.096	4 Policies	Policy P30: Biodiversity, aquatic ecosystem health and mahinga kai.	Support	Not stated	Not stated
S183.097	4 Policies	Policy P36: Restoring Wairarapa Moana	Support	Not stated	Not stated
S183.098	4 Policies	Policy P45: Protecting trout habitat.	Oppose	Trout are an invasive introduced species.	Not stated
S183.099	4 Policies	Policy P78: Managing	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		point source discharges for aquatic ecosystem health and mahinga kai.			
S183.100	5.1 Air quality rules	Rule R1: Outdoor burning - permitted activity.	Support	Firefighting training on Wellington Airport could occur in the coastal marine area.	Not stated
S183.101	5.1 Air quality rules	Rule R3: Outdoor burning for firefighter training - permitted activity.	Support	Firefighting training for Wellington airport could occur in the coastal marine area.	Not stated
S183.102	5.1 Air quality rules	Rule R7: Natural gas and liquefied petroleum gas - permitted activity.	Oppose	Considers large scale burning of natural gas and liquefied petroleum gas should not be occurring	Requested interim measurable milestones for phasing out large scale natural gas and liquefied petroleum gas generators.
S183.103	5.1 Air quality rules	Rule R8: Diesel or kerosene blends - permitted activity.	Oppose	Considers the burning of diesel and kerosene blends should not be occurring.	Seeks the inclusion of interim measurable milestones for phasing out large scale diesel or kerosene blend generators.
S183.104	5.1 Air quality rules	Rule R9: Biogas - permitted activity.	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.105	5.1 Air quality rules	Rule R10: Untreated wood - permitted activity.	Neutral	Not stated	Not stated
S183.106	5.1 Air quality rules	Rule R11: Coal, light fuel oil, and petroleum distillates of higher viscosity - permitted activity.	Oppose	Considers that the burning of coal, light fuel oil, and petroleum distillates of higher viscosity should not be occurring	Seeks the inclusion of interim measurable milestones for phasing out large scale coal, light fuel oil and petroleum distillates of high viscosity generators.
S183.107	5.1 Air quality rules	Rule R12: Emergency power generators - permitted activity.	Support	Not stated	Not stated
S183.108	5.1 Air quality rules	Rule R14: Spray coating within an enclosed space - permitted activity.	Neutral	Not stated	Not stated
S183.109	5.1 Air quality rules	Rule R15: Spray coating not within an enclosed space - permitted activity.	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.110	5.1 Air quality rules	Rule R16: Printing processes - permitted activity.	Neutral	Not stated	Not stated
S183.111	5.1 Air quality rules	Rule R17: Dry cleaning - permitted activity.	Neutral	Not stated	Not stated
S183.112	5.1 Air quality rules	Rule R18: Fume cupboards - permitted activity.	Neutral	Not stated	Not stated
S183.113	5.1 Air quality rules	Rule R19: Workplace ventilation - permitted activity.	Neutral	Not stated	Not stated
S183.114	5.1 Air quality rules	Rule R20: Mechanical processing of metals - permitted activity.	Neutral	Not stated	Not stated
S183.115	5.1 Air quality rules	Rule R21: Thermal metal spraying - permitted activity.	Neutral	Not stated	Not stated
S183.116	5.1 Air quality rules	Rule R25: Abrasive blasting within an enclosed	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		booth - permitted activity.			
S183.117	5.1 Air quality rules	Rule R26: Abrasive blasting outside an enclosed area - permitted activity.	Neutral	Not stated	Not stated
S183.118	5.1 Air quality rules	Rule R27: Handling of bulk solid materials - permitted activity.	Neutral	Not stated	Not stated
S183.119	5.1 Air quality rules	Rule R28: Cement storage - permitted activity.	Neutral	Not stated	Not stated
S183.120	5.1 Air quality rules	Rule R29: Alcoholic beverage production - permitted activity.	Neutral	Not stated	Not stated
S183.121	5.1 Air quality rules	Rule R30: Coffee roasting - permitted activity.	Neutral	Not stated	Not stated
S183.122	5.1 Air quality rules	Rule R31: Food, animal or plant	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		matter manufacturing and processing - permitted activity.			
S183.123	5.1 Air quality rules	Rule R34: Mobile source emissions - permitted activity.	Neutral	Not stated	Not stated
S183.124	5.1 Air quality rules	Rule R35: Water and wastewater processes - permitted activity.	Neutral	Not stated	Not stated
S183.125	5.1 Air quality rules	Rule R35A: Gas processes - permitted activity.	Neutral	Not stated	Not stated
S183.126	5.1 Air quality rules	Rule R36: Drying and heating of minerals - permitted activity.	Support	Not stated	Not stated
S183.127	5.1 Air quality rules	General conditions for the discharge of agrichemicals.	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.128	5.1 Air quality rules	Rule R37: Handheld discharge of agrichemicals - permitted activity.	Support	Not stated	Not stated
S183.129	5.1 Air quality rules	Rule R38: Motorised and aerial discharge of agrichemicals - permitted activity.	Support	Not stated	Not stated
S183.130	5.1 Air quality rules	Rule R39: Agrichemicals not permitted - restricted discretionary activity.	Support	Not stated	Not stated
S183.131	5.1 Air quality rules	Rule R40: Fumigation - permitted activity.	Neutral	Not stated	Not stated
S183.132	5.1 Air quality rules	Rule R42: All other discharges - discretionary activity.	Neutral	Not stated	Not stated
S183.133	5.2 and 5.3 Discharge	Rule R48: Stormwater from an	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	s to land and water and land use rules	individual property - permitted activity.			
S183.134	5.2 and 5.3 Discharges to land and water and land use rules	Rule R49: Stormwater from new subdivision and development - permitted activity.	Neutral	Not stated	Not stated
S183.135	5.2 and 5.3 Discharges to land and water and land use rules	Rule R50: Stormwater from new subdivision and development - restricted discretionary activity.	Neutral	Not stated	Not stated
S183.136	5.2 and 5.3 Discharges to land and water and land use rules	Rule R51: Stormwater to land - permitted activity.	Neutral	Not stated	Not stated
S183.137	5.2 and 5.3 Discharges to land and water and land use rules	Rule R52: Stormwater from a local authority or state highway network -	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		controlled activity.			
S183.138	5.2 and 5.3 Discharges to land and water and land use rules	Rule R53: Stormwater from a local authority or state highway network with a stormwater management strategy - restricted discretionary activity.	Neutral	Not stated	Not stated
S183.139	5.2 and 5.3 Discharges to land and water and land use rules	Rule R54: Stormwater from a port or airport - restricted discretionary activity.	Neutral	Not stated	Not stated
S183.140	5.2 and 5.3 Discharges to land and water and land use rules	Rule R55: All other stormwater - discretionary activity.	Neutral	Not stated	Not stated
S183.141	5.2 and 5.3 Discharges to land	Rule R56: Water races -	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	and water and land use rules	discretionary activity.			
S183.142	5.2 and 5.3 Discharges to land and water and land use rules	Rule R57: Existing pumped drainage schemes - permitted activity.	Neutral	Not stated	Not stated
S183.143	5.2 and 5.3 Discharges to land and water and land use rules	Rule R58: All other pumped drainage schemes - discretionary activity.	Neutral	Not stated	Not stated
S183.144	5.2 and 5.3 Discharges to land and water and land use rules	Rule R65: Wastewater discharges to coastal and fresh water - discretionary activity.	Neutral	Not stated	Not stated
S183.145	5.2 and 5.3 Discharges to land and water and land use rules	Rule R66: Discharges of wastewater to fresh water - non-complying activity.	Neutral	Not stated	Not stated
S183.146	5.2 and 5.3 Discharge	Rule R68: Discharge of treated	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	s to land and water and land use rules	wastewater from a wastewater network - restricted discretionary activity.			
S183.147	5.2 and 5.3 Discharges to land and water and land use rules	Rule R101: Earthworks - permitted activity.	Neutral	Not stated	Not stated
S183.148	5.2 and 5.3 Discharges to land and water and land use rules	Rule R102: Construction of a new farm track - permitted activity.	Neutral	Not stated	Not stated
S183.149	5.2 and 5.3 Discharges to land and water and land use rules	Rule R103: Construction of a new farm track - controlled activity.	Neutral	Not stated	Not stated
S183.150	5.2 and 5.3 Discharges to land and water and land use rules	Rule R104: Vegetation clearance on erosion prone land - permitted activity.	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.151	5.2 and 5.3 Discharges to land and water and land use rules	Rule R105: Vegetation clearance on erosion prone land in accordance with a Freshwater Farm Plan - permitted activity.	Neutral	Not stated	Not stated
S183.152	5.2 and 5.3 Discharges to land and water and land use rules	Rule R106: Earthworks and vegetation clearance for renewable energy generation - restricted discretionary activity.	Neutral	Not stated	Not stated
S183.153	5.2 and 5.3 Discharges to land and water and land use rules	Rule R107: Earthworks and vegetation clearance - discretionary activity.	Neutral	Not stated	Not stated
S183.154	5.2 and 5.3	Rule R110: Use	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Discharges to land and water and land use rules	of rural land in priority catchments - permitted activity.			
S183.155	5.2 and 5.3 Discharges to land and water and land use rules	Rule R111: Use of rural land in priority catchments - controlled activity.	Neutral	Not stated	Not stated
S183.156	5.2 and 5.3 Discharges to land and water and land use rules	Rule R112: Use of rural land in priority catchments - discretionary activity.	Neutral	Not stated	Not stated
S183.157	5.4 Beds of lakes and rivers	Beds of lakes and rivers general conditions.	Neutral	Not stated	Not stated
S183.158	5.4 Beds of lakes and rivers	Rule R128: New structures - permitted activity.	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.159	5.4 Beds of lakes and rivers	Rule R132: Minor sand and gravel extraction - permitted activity.	Neutral	Not stated	Not stated
S183.160	5.4 Beds of lakes and rivers	Rule R133: Gravel extraction for flood protection purposes or erosion mitigation inside sites of significance - discretionary activity.	Neutral	Not stated	Not stated
S183.161	5.4 Beds of lakes and rivers	Rule R145: All other uses of river and lake beds - discretionary activity.	Neutral	Not stated	Not stated
S183.162	5.4 Beds of lakes and rivers	Rule R151A: Ongoing diversion of a river - permitted activity.	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.163	5.5 Water allocation rules	Rule R152: Take and use of water - permitted activity.	Neutral	Not stated	Not stated
S183.164	5.5 Water allocation rules	Rule R153: Farm dairy washdown and milk-cooling water - permitted activity.	Neutral	Not stated	Not stated
S183.165	5.5 Water allocation rules	Rule R154: Water races - permitted activity.	Neutral	Not stated	Not stated
S183.166	5.5 Water allocation rules	Rule R157: Take and use of water - controlled activity.	Neutral	Not stated	Not stated
S183.167	5.5 Water allocation rules	Rule R158: All other take and use - discretiona ry activity.	Neutral	Not stated	Not stated
S183.168	6 Other methods	Method M36: Freshwate	Support	Considers Method M36 to be an important initiative and the community want to be involved in the Freshwater Action Programme.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		r Action Plan programme.			
S183.169	6 Other methods	Method M37: Freshwater Action Plan for the Parangarahu Lakes.	Support	Not stated	Not stated
S183.170	6 Other methods	Method M38: Freshwater Action Plan for the Rangituhi catchment.	Support	Not stated	Not stated
S183.171	6 Other methods	Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Porirua Whaitua.			
S183.172	6 Other methods	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Support	Not stated	Not stated
S183.173	6 Other methods	Method M41: Identifying and responding to degradation in freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Support	Not stated	Not stated
S183.174	6 Other methods	Method M42: Small farm	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		property registration within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.			
S183.175	6 Other methods	Method M43: Supporting the health of urban waterbodies.	Support	Not stated	Not stated
S183.176	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Support	Not stated	Not stated
S183.177	6 Other methods	Method M45: Funding of wastewater and stormwater network upgrades	Support	Considers additional funding is important to speed up the Wellington City Council stormwater network and wastewater catchments.	Not stated
S183.178	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater	Amend	Suggests timeframes to achieve improved fresh water outcomes should include interim and measurable milestones	Seeks the inclusion of interim and measurable milestones for years 2035, 2050 and 2070.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.			
S183.179	8 Whaitua Te Whanganui-a-Tara	Objective WH.O2: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		towards wai ora.			
S183.180	8 Whaitua Te Whanganui-a-Tara	Objective WH.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved to achieve the coastal water objectives set out in Table 8.1.	Support	Not stated	Not stated
S183.181	8 Whaitua Te Whanganui-a-Tara	Table 8.1 Coastal water objectives.	Support	Not stated	Not stated
S183.182	8 Whaitua Te Whanganui-a-Tara	Objective WH.O4: The extent, condition, and connectivity of habitats of	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		nationally threatened freshwater species are increased and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classificati on status.			
S183.183	8 Whaitua Te Whanganui-a-Tara	Objective WH.O5: By 2040 the health and wellbeing of the Parangarahu Lakes and associated natural wetlands are on a trajectory of improvem	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		ent towards wai ora.			
S183.184	8 Whaitua Te Whanganui-a-Tara	Table 8.2 Target attribute states for lakes.	Support	Not stated	Not stated
S183.185	8 Whaitua Te Whanganui-a-Tara	Objective WH.O7: The physical integrity of aquitards is protected so that confined aquifer pressures are maintained.	Support	Not stated	Not stated
S183.186	8 Whaitua Te Whanganui-a-Tara	Objective WH.O8: Primary contact sites within Te Awa Kairangi/Hutt River, Pākuratahi River, Akatarawa River and Wainuiomata River	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		are suitable for primary contact.			
S183.187	8 Whaitua Te Whanganui-a-Tara	Table 8.3 Primary contact site objectives in rivers.	Support	Not stated	Not stated
S183.188	8 Whaitua Te Whanganui-a-Tara	Objective WH.O9: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Support	Not stated	Not stated
S183.189	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers.	Support	Not stated	Not stated
S183.190	8 Whaitua Te Whanganui-a-Tara	Policy WH.P1: Improvement of aquatic ecosystem health.	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.191	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Support	Not stated	Not stated
S183.192	8 Whaitua Te Whanganui-a-Tara	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Support	Not stated	Not stated
S183.193	8 Whaitua Te Whanganui-a-Tara	Policy WH.P4: Achievement of the visual clarity target attribute states.	Support	Not stated	Not stated
S183.194	8 Whaitua Te Whanganui-a-Tara	Table 8.5: Sediment load reductions required to achieve	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		the visual clarity target attribute states.			
S183.195	8 Whaitua Te Whanganui-a-Tara	Policy WH.P5: Localised adverse effects of point source discharge.	Support	Not stated	Not stated
S183.196	8 Whaitua Te Whanganui-a-Tara	Policy WH.P6: Cumulative adverse effects of point source discharges.	Support	Not stated	Not stated
S183.197	8 Whaitua Te Whanganui-a-Tara	Policy WH.P7: Discharges to groundwater.	Support	Not stated	Not stated
S183.198	8 Whaitua Te Whanganui-a-Tara	Policy WH.P8: Avoiding discharges of specific products and waste.	Support	Not stated	Not stated
S183.199	8 Whaitua Te	Policy WH.P9: General	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	stormwater policy to achieve the target attribute states and coastal water objectives.			
S183.200	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	Support	Not stated	Not stated
S183.201	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Support	Not stated	Not stated
S183.202	8 Whaitua Te Whanganui-a-Tara	Policy WH.P12: Managing stormwater from a port or airport.	Support	Concerned about stormwater from Wellington Airport entering Lyall Bay Beach and considers the effects of this need to be managed.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.203	8 Whaitua Te Whanganui-a-Tara	Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy.	Support	Not stated	Not stated
S183.204	8 Whaitua Te Whanganui-a-Tara	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Support	Not stated	Not stated
S183.205	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Support	Not stated	Not stated
S183.206	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater	Oppose	Considers offsetting of environmental damage caused by a new greenfield development will not improve the wai.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discharges from new unplanned greenfield developm ent.			
S183.207	8 Whaitua Te Whangan ui-a-Tara	Policy WH.P17: General wastewate r policy to achieve target attribute states and coastal objectives.	Support	Not stated	Not stated
S183.208	8 Whaitua Te Whangan ui-a-Tara	Policy WH.P18: Progressin g works to meet Escherichi a coli target attribute states.	Support	Not stated	Not stated
S183.209	8 Whaitua Te Whangan ui-a-Tara	Policy WH.P19: Managing wastewate r network catchment discharges .	Support	Not stated	Not stated
S183.210	8 Whaitua Te	Policy WH.P20: Managing	Support	Supports the reduction and removal of wet weather overflow from wastewater into stormwater.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	existing wastewater treatment plant discharges.			
S183.211	8 Whaitua Te Whanganui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Support	Not stated	Not stated
S183.212	8 Whaitua Te Whanganui-a-Tara	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Support	Not stated	Not stated
S183.213	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		farming activities on land with high risk of erosion.			
S183.214	8 Whaitua Te Whanganui-a-Tara	Policy WH.P24: Phasing of farm environment plans.	Support	Not stated	Not stated
S183.215	8 Whaitua Te Whanganui-a-Tara	Policy WH.P25: Managing rural land use change.	Support	Not stated	Not stated
S183.216	8 Whaitua Te Whanganui-a-Tara	Policy WH.P26: Managing livestock access to small rivers.	Support	Not stated	Not stated
S183.217	8 Whaitua Te Whanganui-a-Tara	Policy WH.P27: Promoting stream shading.	Support	Not stated	Not stated
S183.218	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		plantation forestry.			
S183.219	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Support	Not stated	Not stated
S183.220	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Support	Not stated	Not stated
S183.221	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Support	Not stated	Not stated
S183.222	8 Whaitua Te Whanganui-a-Tara	Policy WH.P32: Minimum flows and minimum water levels in Whaitua Te Whanganui-a-Tara.	Support	Not stated	Not stated
S183.223	8 Whaitua Te Whanganui-a-Tara	Policy WH.P33: Core allocation in Whaitua	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Te Whanganui-a-Tara.			
S183.224	8 Whaitua Te Whanganui-a-Tara	Rule WH.R1: Point source discharges of specific contaminants - prohibited activity.	Support	Agrees with Rule WH.R1 and suggests additional education and enforcement to help people understand the effects of contaminants on waterways and the requirement of this rule.	Not stated
S183.225	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Support	Not stated	Not stated
S183.226	8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Support	Considers stormwater from an airport into coastal water should not be a permitted activity.	Not stated
S183.227	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an existing high risk	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		industrial or trade premise - permitted activity.			
S183.228	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Support	Not stated	Not stated
S183.229	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Support	Not stated	Not stated
S183.230	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas -	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		controlled activity.			
S183.231	8 Whaitua Te Whanganui-a-Tara	Rule WH.R8: Stormwater from a port or airport - restricted discretionary activity.	Amend	Considers effects on recreational users should be included as a matter of discretion, as the Wellington Airport discharges stormwater into Lyall Bay, a high use recreational area.	Seeks amendment to the matters of discretion in Rule WH.R8 as follows: Matters for discretion 1. The management of the adverse effects of stormwater capture and discharge, including on aquatic ecosystem health and mahinga kai, contact recreation and Māori customary use, **recreational users** and as required by Policy WH.P12
S183.232	8 Whaitua Te Whanganui-a-Tara	Rule WH.R9: Stormwater from a local authority or state highway network- restricted discretionary activity.	Support	Not stated	Not stated
S183.233	8 Whaitua Te Whanganui-a-Tara	Rule WH.R10: Stormwater from new state highways- discretionary activity.	Support	Not stated	Not stated
S183.234	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		impervious surfaces - discretionary activity.			
S183.235	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Support	Not stated	Not stated
S183.236	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Support	Not stated	Not stated
S183.237	8 Whaitua Te Whanganui-a-Tara	Rule WH.R14: Wastewater network catchment discharges - restricted discretionary activity.	Support	Considers waste water should not be discharged into the stormwater network.	Not stated
S183.238	8 Whaitua Te Whanganui-a-Tara	Rule WH.R15: Existing wastewater discharges	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		from a treatment plant - discretionary activity.			
S183.239	8 Whaitua Te Whanganui-a-Tara	Rule WH.R16: All other discharges of wastewater - non-complying activity.	Support	Not stated	Not stated
S183.240	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity.	Amend	Considers the rule requires amendment to address slash and debris causing flooding in storm events	No decision sought but considers that more work on this rule is needed in relationship to recent slash and debris issues and flooding in storm events.
S183.241	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance on highest erosion risk land - controlled activity.	Amend	Considers the rule requires amendment to address slash and debris causing flooding in storm events	No decision sought but considers that more work on this rule is needed in relationship to recent slash and debris issues and flooding in storm events.
S183.242	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance -	Amend	Considers the rule requires amendment to address slash and debris causing flooding in storm events	No decision sought but considers that more work on this rule is needed in relationship to recent slash and debris issues and flooding in storm events.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discretionary activity.			
S183.243	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Not Stated	Considers the rule requires amendment to address slash and debris causing flooding in storm events	No decision sought but considers that more work on this rule is needed in relationship to recent slash and debris issues and flooding in storm events.
S183.244	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry - discretionary activity.	Not Stated	Considers the rule requires amendment to address slash and debris causing flooding in storm events	No decision sought but considers that more work on this rule is needed in relationship to recent slash and debris issues and flooding in storm events.
S183.245	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.	Not Stated	Considers the rule requires amendment to address slash and debris causing flooding in storm events	No decision sought but considers that more work on this rule is needed in relationship to recent slash and debris issues and flooding in storm events.
S183.246	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Neutral	Not stated	Not stated
S183.247	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Neutral	Not stated	Not stated
S183.248	8 Whaitua Te	Rule WH.R25:	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	Earthworks - non-complying activity.			
S183.249	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Support	Not stated	Not stated
S183.250	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Support	Not stated	Not stated
S183.251	8 Whaitua Te Whanganui-a-Tara	Table 8.6: Phase-in of farm environment plans for part Freshwater Management Units.	Support	Not stated	Not stated
S183.252	8 Whaitua Te	Rule WH.R28:	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	Livestock access to a small river - permitted activity.			
S183.253	8 Whaitua Te Whanganui-a-Tara	Rule WH.R29: Livestock access to a small river - discretionary activity.	Support	Not stated	Not stated
S183.254	8 Whaitua Te Whanganui-a-Tara	Rule WH.R30: The use of land for farming activities - discretionary activity.	Support	Not stated	Not stated
S183.255	8 Whaitua Te Whanganui-a-Tara	Rule WH.R31: Change of rural land use - discretionary activity.	Support	Not stated	Not stated
S183.256	8 Whaitua Te Whanganui-a-Tara	Rule WH.R32: Farming activities - non-complying activity.	Support	Not stated	Not stated
S183.257	8 Whaitua Te	Rule WH.R33:	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	Take and use of water in the Whaitua Te Whanganui-a Tara - restricted discretionary activity.			
S183.258	8 Whaitua Te Whanganui-a-Tara	Rule WH.R34: Take and use of water in the Whaitua Te Whanganui-a-Tara - discretionary activity.	Neutral	Not stated	Not stated
S183.259	8 Whaitua Te Whanganui-a-Tara	Rule WH.R35: Take and use of water from outstanding rivers or lakes - non-complying activity.	Neutral	Not stated	Not stated
S183.260	8 Whaitua Te Whanganui-a-Tara	Rule WH.R36: Take and use of	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		water exceeding minimum flows or core allocation - prohibited activity.			
S183.261	8 Whaitua Te Whanganui-a-Tara	Table 8.7: Minimum flows for rivers in the Whaitua Te Whanganui-a-Tara.	Neutral	Not stated	Not stated
S183.262	8 Whaitua Te Whanganui-a-Tara	Table 8.8: Surface water allocation amounts for rivers and Category A groundwater and Category B groundwater in the Te Awa Kairangi/Hutt River, Wainuiomata River and	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Ōrongorongo River catchments.			
S183.263	8 Whaitua Te Whanganui-a-Tara	Table 8.9: Groundwater allocation amounts for Category B groundwater and Category C groundwater in the Whaitua Te Whanganui-a-Tara.	Neutral	Not stated	Not stated
S183.264	8 Whaitua Te Whanganui-a-Tara	Figure 8.1: Te Awa Kairangi / Hutt River and Upper Hutt groundwater in Tables 8.8 and 8.9.	Neutral	Not stated	Not stated
S183.265	8 Whaitua Te Whanganui-a-Tara	Figure 8.2: Te Awa Kairangi / Hutt River and Lower Hutt	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		groundwater in Tables 8.8 and 8.9.			
S183.266	9 Te Awarua-o-Porirua Whaitua	Objective P.O1: The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100.	Support	Suggests timeframes to achieve improved fresh water outcomes should include interim and measurable milestones	Seeks the inclusion of interim measurable milestones for years 2035, 2050 and 2070.
S183.267	9 Te Awarua-o-Porirua Whaitua	Objective P.O2: Te Awarua-o-Porirua's groundwater, rivers, lakes and natural wetlands, and their margins	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		are on a trajectory of measurable improvement towards wai ora.			
S183.268	9 Te Awarua-o-Porirua Whaitua	Objective P.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Pāuatahanui Inlet, Onepoto Arm and the open coastal areas of Te Awarua-o-Porirua is maintained or improved to achieve the coastal water objectives set out in Table 9.1.	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.269	9 Te Awarua-o-Porirua Whaitua	Table 9.1: Coastal water objectives.	Support	Not stated	Not stated
S183.270	9 Te Awarua-o-Porirua Whaitua	Objective P.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased, and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status.	Support	Not stated	Not stated
S183.271	9 Te Awarua-o-Porirua Whaitua	Objective P.O5: Groundwater flows and levels,	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and water quality, are maintained.			
S183.272	9 Te Awarua-o-Porirua Whaitua	Objective P.O6: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Support	Not stated	Not stated
S183.273	9 Te Awarua-o-Porirua Whaitua	Table 9.2: Target attribute states for rivers.	Support	Not stated	Not stated
S183.274	9 Te Awarua-o-Porirua Whaitua	Policy P.P1: Improvement of aquatic ecosystem health.	Support	Not stated	Not stated
S183.275	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		target attribute states and coastal water objectives.			
S183.276	9 Te Awarua-o-Porirua Whaitua	Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Support	Not stated	Not stated
S183.277	9 Te Awarua-o-Porirua Whaitua	Policy P.P4: Contaminant load reductions.	Support	Not stated	Not stated
S183.278	9 Te Awarua-o-Porirua Whaitua	Table 9.3: Harbour arm catchment contaminant load reductions.	Support	Not stated	Not stated
S183.279	9 Te Awarua-o-Porirua Whaitua	Table 9.4: Part Freshwater Management Unit sediment	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		load reductions required to achieve the visual clarity target attribute state.			
S183.280	9 Te Awarua-o-Porirua Whaitua	Policy P.P5: Localised adverse effects of point source discharges.	Support	Not stated	Not stated
S183.281	9 Te Awarua-o-Porirua Whaitua	Policy P.P6: Point source discharges.	Support	Not stated	Not stated
S183.282	9 Te Awarua-o-Porirua Whaitua	Policy P.P7 Discharges to groundwater.	Support	Not stated	Not stated
S183.283	9 Te Awarua-o-Porirua Whaitua	Policy P.P8 Avoiding discharges of specific products and waste.	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.284	9 Te Awarua-o-Porirua Whaitua	Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Support	Not stated	Not stated
S183.285	9 Te Awarua-o-Porirua Whaitua	Policy P.P10: Managing adverse effects of stormwater discharges.	Support	Not stated	Not stated
S183.286	9 Te Awarua-o-Porirua Whaitua	Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises.	Support	Not stated	Not stated
S183.287	9 Te Awarua-o-Porirua Whaitua	Policy P.P12: Managing stormwater network	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discharges through a Stormwater Management Strategy.			
S183.288	9 Te Awarua-o-Porirua Whaitua	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Support	Not stated	Not stated
S183.289	9 Te Awarua-o-Porirua Whaitua	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Support	Not stated	Not stated
S183.290	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		development.			
S183.291	9 Te Awarua-o-Porirua Whaitua	Policy P.P16: General wastewater policy to achieve target attribute states and coastal water objectives.	Support	Not stated	Not stated
S183.292	9 Te Awarua-o-Porirua Whaitua	Policy P.P17: Progressing works to meet Escherichia coli target attribute states.	Support	Not stated	Not stated
S183.293	9 Te Awarua-o-Porirua Whaitua	Policy P.P18: Managing wastewater network catchment discharges.	Support	Not stated	Not stated
S183.294	9 Te Awarua-o-Porirua Whaitua	Policy P.P19: Managing existing wastewater treatment	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		plant discharges .			
S183.295	9 Te Awarua-o-Porirua Whaitua	Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Support	Not stated	Not stated
S183.296	9 Te Awarua-o-Porirua Whaitua	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Support	Not stated	Not stated
S183.297	9 Te Awarua-o-Porirua Whaitua	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		with high risk of erosion.			
S183.298	9 Te Awarua-o-Porirua Whaitua	Policy P.P23: Phasing of farm environment plans.	Support	Not stated	Not stated
S183.299	9 Te Awarua-o-Porirua Whaitua	Policy P.P24: Managing rural land use change.	Support	Not stated	Not stated
S183.300	9 Te Awarua-o-Porirua Whaitua	Policy P.P25: Promoting stream shading.	Support	Not stated	Not stated
S183.301	9 Te Awarua-o-Porirua Whaitua	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Support	Not stated	Not stated
S183.302	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Support	Not stated	Not stated
S183.303	9 Te Awarua-	Policy P.P28:	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	o-Porirua Whaitua	Discharge standard for earthworks sites.			
S183.304	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Support	Not stated	Not stated
S183.305	9 Te Awarua-o-Porirua Whaitua	Policy P.P30: Minimum flows and minimum water levels in Te Awarua-o-Porirua Whaitua.	Support	Not stated	Not stated
S183.306	9 Te Awarua-o-Porirua Whaitua	Policy P.P31: Water takes at minimum flows and minimum water levels.	Support	Not stated	Not stated
S183.307	9 Te Awarua-o-Porirua Whaitua	Policy P.P32: Allocation in the Te Awarua-o-	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Porirua Whaitua.			
S183.308	9 Te Awarua-o-Porirua Whaitua	Rule P.R1: Point source discharges of specific contaminants - prohibited activity.	Support	Not stated	Not stated
S183.309	9 Te Awarua-o-Porirua Whaitua	Rule P.R2: Stormwater to land - permitted activity.	Support	Not stated	Not stated
S183.310	9 Te Awarua-o-Porirua Whaitua	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Support	Not stated	Not stated
S183.311	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.312	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Support	Not stated	Not stated
S183.313	9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas- controlled activity.	Support	Not stated	Not stated
S183.314	9 Te Awarua-o-Porirua Whaitua	Rule P.R8: Stormwater from a local authority or state highway network- restricted discretionary activity.	Support	Not stated	Not stated
S183.315	9 Te Awarua-o-Porirua Whaitua	Rule P.R9: Stormwater from new state highways-	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		discretionary activity.			
S183.316	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Support	Not stated	Not stated
S183.317	9 Te Awarua-o-Porirua Whaitua	Rule P.R11: All other stormwater discharges - non-complying activity.	Support	Not stated	Not stated
S183.318	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Support	Not stated	Not stated
S183.319	9 Te Awarua-o-Porirua Whaitua	Rule P.R13: Wastewater network	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		catchment discharges to water - restricted discretionary activity.			
S183.320	9 Te Awarua-o-Porirua Whaitua	Rule P.R14: Existing wastewater discharges from a treatment plant to coastal and freshwater - discretionary activity.	Support	Not stated	Not stated
S183.321	9 Te Awarua-o-Porirua Whaitua	Rule P.R15: All other discharges of wastewater - non-complying activity.	Support	Not stated	Not stated
S183.322	9 Te Awarua-o-Porirua Whaitua	Rule P.R16: Vegetation clearance on highest erosion risk land-	Amend	Considers the rule requires amendment to address slash and debris causing flooding in storm events	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		permitted activity.			
S183.323	9 Te Awarua-o-Porirua Whaitua	Rule P.R17: Vegetation clearance on highest erosion risk land - controlled activity.	Amend	Considers the rule requires amendment to address slash and debris causing flooding in storm events	Not stated
S183.324	9 Te Awarua-o-Porirua Whaitua	Rule P.R18: Vegetation clearance - discretionary activity.	Amend	Considers the rule requires amendment to address slash and debris causing flooding in storm events	Not stated
S183.325	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry - controlled activity.	Amend	Considers the rule requires amendment to address slash and debris causing flooding in storm events	Not stated
S183.326	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry - discretionary activity.	Amend	Considers the rule requires amendment to address slash and debris causing flooding in storm events	Not stated
S183.327	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land -	Amend	Considers the rule requires amendment to address slash and debris causing flooding in storm events	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		prohibited activity.			
S183.328	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Support	Not stated	Not stated
S183.329	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Support	Not stated	Not stated
S183.330	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks - non-complying activity.	Support	Not stated	Not stated
S183.331	9 Te Awarua-o-Porirua Whaitua	Rule P.R25: Farming activities on properties of between 4 hectares and 20 hectares - permitted activity.	Support	Not stated	Not stated
S183.332	9 Te Awarua-o-Porirua Whaitua	Rule P.R26: Farming activities	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		on 20 hectares or more of land - permitted activity.			
S183.333	9 Te Awarua-o-Porirua Whaitua	Table 9.5: Phase in of farm environment plans for Part Freshwater Management Units.	Support	Not stated	Not stated
S183.334	9 Te Awarua-o-Porirua Whaitua	Rule P.R27: The use of land for farming activities - discretionary activity.	Support	Not stated	Not stated
S183.335	9 Te Awarua-o-Porirua Whaitua	Rule P.R28: Change of rural land use - discretionary activity.	Support	Not stated	Not stated
S183.336	9 Te Awarua-o-Porirua Whaitua	Rule P.R29: Farming activities - non-complying activity.	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.337	9 Te Awarua-o-Porirua Whaitua	Rule P.R30: Take and use of water - permitted activity.	Support	Not stated	Not stated
S183.338	9 Te Awarua-o-Porirua Whaitua	Rule P.R31: Take and use of water - restricted discretionary activity.	Support	Not stated	Not stated
S183.339	9 Te Awarua-o-Porirua Whaitua	Rule P.R32: Take and use of water - discretionary activity.	Support	Not stated	Not stated
S183.340	9 Te Awarua-o-Porirua Whaitua	Rule P.R33: Taking and use of water that exceeds minimum flows or allocation amounts - prohibited activity.	Support	Not stated	Not stated
S183.341	9 Te Awarua-o-Porirua Whaitua	Table 9.6: Minimum flows for Te	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Awarua-o-Porirua Whaitua.			
S183.342	9 Te Awarua-o-Porirua Whaitua	Table 9.7: Surface water allocation amounts for Te Awarua-o-Porirua Whaitua.	Support	Not stated	Not stated
S183.343	12 Schedules	Schedule A: Outstanding water bodies	Support	Not stated	Not stated
S183.344	12 Schedules	Schedule A2: Lakes with outstanding indigenous ecosystem values.	Support	Not stated	Not stated
S183.345	12 Schedules	Schedule F: Ecosystems and habitats with significant indigenous biodiversity values.	Support	Not stated	Not stated
S183.346	12 Schedules	Schedule F1: Rivers and lakes	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		with significant indigenous ecosystems.			
S183.347	12 Schedules	Schedule F2a: Significant habitats for indigenous birds in rivers.	Support	Not stated	Not stated
S183.348	12 Schedules	Schedule F2b: Significant habitats for indigenous birds in lakes.	Support	Not stated	Not stated
S183.349	12 Schedules	Schedule F2c: Significant habitats for indigenous birds in the coastal marine area.	Support	Notes banded dotterel have been known to breed in the Palmer Head to Lyall Bay area	Not stated
S183.350	12 Schedules	Schedule F4: Sites with significant indigenous biodiversity values in	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		the coastal marine area.			
S183.351	12 Schedules	Schedule F5: Habitats with significant indigenous biodiversity values in the coastal marine area.	Support	Not stated	Not stated
S183.352	12 Schedules	Schedule 27: Freshwater Action Plan requirements.	Support	Not stated	Not stated
S183.353	12 Schedules	A Freshwater Action Plans	Support	Not stated	Not stated
S183.354	12 Schedules	A1 Purpose	Support	Not stated	Not stated
S183.355	12 Schedules	A2 Freshwater Action Plans required in Whaitua Te Whanganui-a-Tara.	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.356	12 Schedules	A3 Freshwater Action Plans required in Te Awarua-o-Porirua Whaitua.	Support	Not stated	Not stated
S183.357	12 Schedules	B Freshwater Action Plan requirements.	Support	Not stated	Not stated
S183.358	12 Schedules	B1. Principles.	Support	Not stated	Not stated
S183.359	12 Schedules	B2. General Content.	Support	Not stated	Not stated
S183.360	12 Schedules	B3 Necessary actions.	Support	Not stated	Not stated
S183.361	12 Schedules	C. Freshwater Action Plans in Whaitua Te Whanganui-a-Tara	Support	Not stated	Not stated
S183.362	12 Schedules	D Freshwater Action Plans in Te Awarua-o-	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Porirua Whaitua			
S183.363	12 Schedules	Schedule 28: Stormwater Contaminant Treatment.	Support	Not stated	Not stated
S183.364	12 Schedules	Table 1: Target load Reductions for Copper and Zinc	Support	Not stated	Not stated
S183.365	12 Schedules	Table 2: Additional Devices and Specified Load Reductions for Copper and Zinc	Support	Not stated	Not stated
S183.366	12 Schedules	Schedule 29: Stormwater Impact Assessments.	Support	Not stated	Not stated
S183.367	12 Schedules	Schedule 30: Financial Contributions.	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.368	12 Schedules	A Context	Neutral	Not stated	Not stated
S183.369	12 Schedules	B Purpose	Neutral	Not stated	Not stated
S183.370	12 Schedules	C Definition of an Equivalent Household Unit	Neutral	Not stated	Not stated
S183.371	12 Schedules	D Calculation of level of contribution	Neutral	Not stated	Not stated
S183.372	12 Schedules	Table D1. Financial contribution calculations for residential greenfield development	Neutral	Not stated	Not stated
S183.373	12 Schedules	Tale D2. Financial contribution calculations for non-residential greenfield development and	Neutral	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		new roads/state highways			
S183.374	12 Schedules	E Use	Neutral	Not stated	Not stated
S183.375	12 Schedules	Schedule 31: Stormwater Management Strategy - Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Support	Not stated	Not stated
S183.376	12 Schedules	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Support	Not stated	Not stated
S183.377	12 Schedules	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.378	12 Schedules	A Purposes of the Erosion and Sediment Management Plan	Support	Not stated	Not stated
S183.379	12 Schedules	B Management objectives	Support	Not stated	Not stated
S183.380	12 Schedules	C Requirements of the Erosion and Sediment Management Plan	Support	Not stated	Not stated
S183.381	12 Schedules	C1 Contents of the Erosion and Sediment Management Plan	Support	Not stated	Not stated
S183.382	12 Schedules	D Amendment of Erosion and Sediment Management Plan	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.383	12 Schedules	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	Support	Not stated	Not stated
S183.384	12 Schedules	A Purpose of the Erosion and Sediment Management Plan	Support	Not stated	Not stated
S183.385	12 Schedules	B Management objectives	Support	Not stated	Not stated
S183.386	12 Schedules	C Requirements of the Erosion and Sediment Management Plan	Support	Not stated	Not stated
S183.387	12 Schedules	C1 Contents of the Erosion and Sediment Management Plan	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.388	12 Schedules	C2 Certification of the Erosion and Sediment Management Plan	Support	Not stated	Not stated
S183.389	12 Schedules	D Amendment of Erosion and Sediment Management Plan	Support	Not stated	Not stated
S183.390	12 Schedules	Schedule 35: Small farm registration.	Support	Not stated	Not stated
S183.391	12 Schedules	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.392	12 Schedules	A Certification requirements under the Resource Management (Freshwater Farm Plans) Regulations 2023.	Support	Not stated	Not stated
S183.393	12 Schedules	B Management objectives.	Support	Not stated	Not stated
S183.394	12 Schedules	C Content of a farm environment plan.	Support	Not stated	Not stated
S183.395	12 Schedules	D Risk assessment and mitigation to address risk.	Support	Not stated	Not stated
S183.396	12 Schedules	Table D1. Financial contribution calculations for residential greenfield development	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.397	12 Schedules	E Erosion Risk Treatment Plan.	Support	Not stated	Not stated
S183.398	12 Schedules	F Small stream riparian programme.	Support	Not stated	Not stated
S183.399	13 Maps	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4).	Support	Not stated	Not stated
S183.400	13 Maps	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 1: (Kāpiti).	Support	Not stated	Not stated
S183.401	13 Maps	Map 27: Sites with significant indigenous biodiversity values in	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		the coastal marine area (Schedule F4) Insert 2: (Wellington Harbour).			
S183.402	13 Maps	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 2: Te Awarua-o-Porirua.	Support	Not stated	Not stated
S183.403	13 Maps	Map 77: Habitats of nationally threatened freshwater species - Te Awarua-o-Porirua and Te Whanganui-a-Tara (Schedule F1).	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S183.404	13 Maps	Map 78: Part freshwater management units and target attribute state sites (rivers) - Te Awarua-o-Porirua.	Support	Not stated	Not stated
S183.405	13 Maps	Map 79: Part freshwater management units and target attribute state sites (rivers) - Te Whanganui-a-Tara.	Support	Not stated	Not stated
S183.406	13 Maps	Map 80: Part freshwater management units and target attribute state sites (lakes) - Te Whanganui-a-Tara.	Support	Not stated	Not stated
S183.407	13 Maps	Map 81: Rivers and	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		catchment management units for water takes - Te Awarua-o-Porirua.			
S183.408	13 Maps	Map 82: Coastal water management units - Te Awarua-o-Porirua.	Support	Not stated	Not stated
S183.409	13 Maps	Map 83: Coastal water management units - Te Whanganui-a-Tara.	Support	Not stated	Not stated
S183.410	13 Maps	Map 84: Harbour arm catchments - Te Awarua-o-Porirua.	Support	Not stated	Not stated
S183.411	13 Maps	Map 85: Primary contact sites - Te Whanganui-a-Tara.	Support	Not stated	Not stated
S183.412	13 Maps	Map 86: Unplanned	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		greenfield areas - Porirua City Council.			
S183.413	13 Maps	Map 87: Unplanned greenfield areas - Wellington City Council.	Support	Not stated	Not stated
S183.414	13 Maps	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Support	Not stated	Not stated
S183.415	13 Maps	Map 89: Unplanned greenfield areas - Hutt City Council.	Support	Not stated	Not stated
S183.416	13 Maps	Map 90: Highest and high erosion risk land (Pasture) - Te Awarua-o-Porirua.	Support	Not stated	Not stated
S183.417	13 Maps	Map 91: Highest erosion risk land	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		(Woody vegetation) - Te Awarua-o-Porirua.			
S183.418	13 Maps	Map 92: Highest erosion risk land (Plantation forestry) - Te Awarua-o-Porirua.	Support	Not stated	Not stated
S183.419	13 Maps	Map 93: Highest and high erosion risk land (Pasture) - Te Whanganui-a-Tara.	Support	Not stated	Not stated
S183.420	13 Maps	Map 94: Highest erosion risk land (Woody vegetation clearance) - Te Whanganui-a-Tara.	Support	Not stated	Not stated
S183.421	13 Maps	Map 95: Highest erosion risk land (Plantation	Support	Not stated	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		forestry) - Te Whanganui-a-Tara.			
S183.422	13 Maps	Map 96: Mākara catchment.	Support	Not stated	Not stated
S183.423	13 Maps	Map 97: Mangaroa catchment.	Support	Not stated	Not stated

S113 Zealandia Te Māra a Tāne

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S113.001	General comments	General comments - overall	Support	Supports the intent to stop further degradation of freshwater bodies in the Wellington region. Supports the collaborative planning process involving Whaitua committees.	Not stated
S113.002	General comments	General comments - overall	Not Stated	Advocates for the implementation of the proposed changes in the timeframes proposed to ensure that Wellington continues to be an exemplar of urban biodiversity management and further degradation of freshwater is halted.	Not stated
S113.003	5.4 Beds of lakes and rivers	5.4.4 Uses of beds of lakes and rivers general conditions.	Support	Supports the protection of beds of lakes and rivers, with specific considerations for the protection of inanga.	Not stated
S113.004	5.4 Beds of lakes and rivers	Rule R133: Gravel extraction	Amend	Considers the Kaiwharawhara estuary may benefit from the installation of planter boxes alongside concrete walls as this would enhance inanga spawning habitat, provide flow variation alongside	Amend rule to consider hard infrastructural improvements required to dechannelise river banks.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		for flood protection purposes or erosion mitigation inside sites of significance - discretionary activity.		the stream and have overall positive environmental outcomes.	
S113.005	6 Other methods	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Support	Supports addressing and minimising the environmental impacts of fish barriers to promote diadromous species to complete their life cycles	Not stated
S113.006	6 Other methods	Method M41: Identifying and responding to degradation in freshwater bodies within Whaitua Te	Amend	Not stated	Increase the frequency of information published on degrading waterbodies trends from at least once every five years to once every three years.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.			
S113.007	6 Other methods	Method M45: Funding of wastewater and stormwater network upgrades	Support	Supports improved water quality outcomes with specific funding allocated towards stormwater and wastewater network upgrades. Notes that the Kaiwharawhara awa has endured harm due to stormwater and wastewater overflows which violates the principles of Te Mana o Te Wai. Considers Wellington Water Ltd. is not adequately resourced to upgrade sewerage networks within their allocated funding.	Not stated
S113.008	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.	Support	Supports establishing a vision to restore the āhua of freshwater bodies by 2100 with specific goals to accomplish this vision in the interim. Considers this aspiration aligns with the 100-year vision of Sanctuary to Sea | Kia Mouriora te Kaiwharawhara to restore the mouri of the Kaiwharawhara catchment, so that the wellbeing of te awa, te ngahere, and ngā tāngata are restored and thriving.	Not stated
S113.009	8 Whaitua Te	Objective WH.O2:	Support	Supports establishing a vision to restore the āhua of freshwater bodies by 2100 with specific goals to	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Whanganui-a-Tara	The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora.		accomplish this vision in the interim. Considers this aspiration aligns with the 100-year vision of Sanctuary to Sea | Kia Mouriora te Kaiwharawhara to restore the mouri of the Kaiwharawhara catchment, so that the wellbeing of te awa, te ngahere, and ngā tāngata are restored and thriving.	
S113.010	8 Whaitua Te Whanganui-a-Tara	Objective WH.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or	Support	Concerned that current development works at the mouth of the Kaiwharawahra estuary intend to permanently restrict public access and that in order for an ecosystem to thrive, sustainable and responsible access must be preserved.	Not stated

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		improved to achieve the coastal water objectives set out in Table 8.1.			
S113.011	8 Whaitua Te Whanganui-a-Tara	Table 8.2 Target attribute states for lakes.	Support	Not stated	Retain as notified.
S113.012	8 Whaitua Te Whanganui-a-Tara	Policy WH.P12: Managing stormwater from a port or airport.	Support	Considers the Kaiwharawhara awa stands to benefit from an overall reduction of copper and zinc concentrations in stormwater systems.	Not stated
S113.013	12 Schedules	Schedule F1: Rivers and lakes with significant indigenous ecosystems.	Amend	Notes that both ākahi/freshwater mussel (Echyridella menziesii) (At Risk declining) and E. aucklandica (Threatened- Nationally Vulnerable) have been reintroduced to the upper catchment in Zealandia	Amend to add reach of tidal influence' to the inanga spawning habitat column. Amend to add kākahi/freshwater mussel (Echyridella menziesii) (At Risk declining) and E. aucklandica (Threatened- Nationally Vulnerable) to nationally threatened freshwater species column.
S113.014	12 Schedules	A2 Freshwater Action Plans required in Whaitua Te Whanganui-a-Tara.	Amend	Supports the existing list of attributes in Schedule 27 A2 Freshwater Action Plans required in Whaitua Te Whanganui-a-Tara. Suggests the addition of E. coli and deposited fine sediment to the Kaiwharawhara stream list of attributes for which Freshwater Action Plans is prepared. Notes both of these attributes are increasingly problematic for the whaitua with erosion increasing	Add E. coli and deposited fine sediment to the Kaiwharawhara stream list of attributes for which Freshwater Action Plans will be prepared.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				in severe weather events increasing sediment loading of the awa and significant wastewater pipe overflows introducing faecal matter to the awa (as noted by the baseline E rating).	
S113.015	6 Other methods	6.16 Supporting improved water quality outcomes.	Support	Supports addressing and minimising the environmental impacts of fish barriers to promote diadromous species to complete their life cycles. Supports improved water quality outcomes with specific funding allocated towards stormwater and wastewater network upgrades.	Not stated