

Once you have completed your feedback, please email to regionalplan@gw.govt.nz

| Please enter your details below | |
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| *Submitter Name: Full name, or Name of Organisation / Company | Enviro NZ Services Ltd (Enviro NZ) |
| Contact person for submission: (If different to above) | Kaaren Rosser |
| Telephone no: (Not required) | 275541065 |
| *Address for service: (Email, or physical address) Please note, an <u>email address</u> is the preferred method | kaaren.rosser@environz.co.nz |
| *I wish to be heard in support of my submission at a hearing | Select yes or no |
| *I would consider presenting a joint case at the hearing with others who make a similar submission | Yes |
| *I could gain an advantage in trade competition through this submission | No |
| Only answer this question if you answered 'yes' to the above question. I am directly affected by an effect of the subject matter of the submission that: A) adversely affects the environment; and B) does not relate to trade competition or the effects of trade competition | Select A or B |
| In providing a submission to Greater Wellington, I agree to having read and understood the terms and process outlined in our Information Statement | |
| If providing a submission on behalf of a company / organisation I confirm that I have authority to do so: |  |
| Date: | 15/12/2023 |
| Please enter your feedback in the next worksheet "2) Feedback on Provisions". All of the provisions in the proposed change have been included so please place your comments in the corresponding cells. If you have questions on how to use this submission form please use our Submitter User Help Guide or email one of our friendly team at regionalplan@gw.govt.nz | |

| Chapter No and Name | Provision No. & Title | Type of Change | Stance | RMA Process | Reason for feedback: | Decision Sought * |
|---------------------|--|---|---|---|---|---|
| | | Amended New Not applicable to Whaitua Not applicable to Te-Awarua-o- Porirua N/A | Support Oppose Neutral Amend Not stated | Freshwater Part 1 Schedule 1 Both | Please provide a summary of the reasons for your feedback on each provision to help us understand your position. | Please describe the actual changes to the provision that you would like to see and, where possible, include your suggested alternative wording. NOTE: Any deletions should be identified using strikethrough , and insertions should be identified using bold . |
| | High risk industrial or trade premise | New | Support | Part 1 Schedule 1 | Limiting the definition to premises that use contaminants that are exposed to rain does not penalise entirely internal operations and encourages good environmental outcomes | |
| | Impervious surfaces | New | Amend | Part 1 Schedule 1 | 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) |
| | Stormwater treatment system | New | Amend | Part 1 Schedule 1 | Very few systems completely remove all contaminants. While removal is the intended outcome, practically it is not always achievable depending on the contaminants, the treatment train and weather conditions. | A device, structure or system used to remove reduce stormwater contaminants and/or... |
| | Rule R42: All other discharges – discretionary activity. | Amended | Neutral | Part 1 Schedule 1 | | |
| | Rule R48: Stormwater from an individual property – permitted activity. | Not applicable to Whaitua | Not stated | Part 1 Schedule 1 | | |
| | Policy WH.P6: Cumulative adverse effects of point source discharges. | New | Amend | Part 1 Schedule 1 | Clause (b)(i) requires all consent applications to have upgrades whereas some sites may already meet the target and it would be extremely inequitable to require upgrades when suitable treatment is already in place. | (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.... |
| | Policy WH.P7: Discharges to groundwater. | New | Neutral | Freshwater | | |
| | Policy WH.P8: Avoiding discharges of specific products and waste. | New | Amend | Part 1 Schedule 1 | The definition of 'untreated' is open to interpretation and would have unintended consequences. It could mean any cut tree or plant material requiring stormwater treatment. There should be a volume threshold. | Amend rule to provide clarity on untreated waste and provide a volume threshold. |
| | Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives. | New | Support | Part 1 Schedule 1 | | |
| | Policy WH.P10: Managing adverse effects of stormwater discharges. | New | Amend | Part 1 Schedule 1 | Hydrological control and water sensitive urban design measures are not always required, so the imperative should be removed. | (b) <u>generally</u> using hydrological control and water sensitive urban design measures |
| | Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises. | New | Neutral | Part 1 Schedule 1 | | |
| | Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces. | New | Amend | Part 1 Schedule 1 | Support the policy however the degree of maintenance, or the enhancement of stormwater quality to meet the policy is questioned and the requirement for treatment may not be necessary in all cases, particularly where the increase in impervious areas is minimal. | Amend policy to allow for practical achievement and allow for where treatment is already in place. |
| | Policy WH.P29: Management of earthworks. | New | Support | Part 1 Schedule 1 | | |
| | Policy WH.P30: Discharge standard for earthworks. | New | Neutral | Part 1 Schedule 1 | | |
| | Policy WH.P31: Winter shut down of earthworks. | New | Neutral | Part 1 Schedule 1 | | |
| | Rule WH.R1: Point source discharges of specific contaminants – prohibited activity. | New | Neutral | Part 1 Schedule 1 | This may be difficult to enforce and requires no accidental spills from any site. How are natural disasters treated? Also 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. | |
| | Rule WH.R2: Stormwater to land – permitted activity. | New | Support | Freshwater | | Retain as notified. |
| | Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water – permitted activity. | New | Support | Part 1 Schedule 1 | | Retain as notified. |
| | Rule WH.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity. | New | Support | Part 1 Schedule 1 | The rule is appropriate for existing high risk ITA's. | Retain as notified. |
| | Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity. | New | Amend | Part 1 Schedule 1 | The requirement for hydrological control is onerous for a 30m2 increase or redevelopment of impervious areas. There needs to be a trigger for hydrological control, particularly where hydrological control 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. |
| | Rule WH.R6: Stormwater from new greenfield impervious surfaces – controlled activity. | New | Neutral | Part 1 Schedule 1 | | |
| | Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas – controlled activity. | New | Neutral | Part 1 Schedule 1 | | |
| | Rule WH.R8: Stormwater from a port or airport – restricted discretionary activity. | New | Neutral | Part 1 Schedule 1 | | |
| | Rule WH.R9: Stormwater from a local authority or state highway network – restricted discretionary activity. | New | Neutral | Part 1 Schedule 1 | | |
| | Rule WH.R10: Stormwater from new state highways – discretionary activity. | New | Neutral | Part 1 Schedule 1 | | |
| | Rule WH.R11: Stormwater from new and redeveloped impervious surfaces – discretionary activity. | New | Amend | Part 1 Schedule 1 | Clarification is needed on how an activity can be prohibited under WH.R13 but discretionary under this rule. | Amend rule to clarify how rule applies. |
| | Rule WH.R12: All other stormwater discharges – non-complying activity. | New | Neutral | Part 1 Schedule 1 | | |
| | Rule WH.R13: Stormwater from new unplanned greenfield development – prohibited activity. | New | Neutral | Part 1 Schedule 1 | | |
| | Rule WH.R23: Earthworks – permitted activity. | New | Support | Freshwater | | |
| | Rule WH.R24: Earthworks – restricted discretionary activity. | New | Neutral | Part 1 Schedule 1 | | |
| | Rule WH.R25: Earthworks – non-complying activity. | New | Support | Part 1 Schedule 1 | | |
| | Policy P.P5: Localised adverse effects of point source discharges. | New | Support | Part 1 Schedule 1 | | |
| | Policy P.P6: Point source discharges. | New | Amend | Part 1 Schedule 1 | Clause (b)(i) requires all consent applications to have upgrades whereas some sites may already meet the target and it would be extremely inequitable to require upgrades when suitable treatment is already in place. | (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.... |
| | Policy P.P7 Discharges to groundwater. | New | Support | Freshwater | | |
| | Policy P.P8 Avoiding discharges of specific products and waste. | New | Amend | Part 1 Schedule 1 | The definition of 'untreated' is open to interpretation and would have unintended consequences. It could mean any cut tree or plant material requiring stormwater treatment. There should be a volume threshold. | Amend rule to provide clarity on untreated waste and provide a volume threshold. |
| | Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives. | New | Support | Part 1 Schedule 1 | | |
| | Policy P.P10: Managing adverse effects of stormwater discharges. | New | Amend | Part 1 Schedule 1 | Hydrological control and water sensitive urban design measures are not always required, so the imperative should be removed. | (b) <u>generally</u> using hydrological control and water sensitive urban design measures |
| | Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises. | New | Neutral | Part 1 Schedule 1 | | |
| | Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces. | New | Amend | Part 1 Schedule 1 | Support the policy however the degree of maintenance, or the enhancement of stormwater quality to meet the policy is questioned and the requirement for treatment may not be necessary in all cases, particularly where the increase in impervious areas is minimal. | Amend policy to allow for practical achievement and allow for where treatment is already in place. |
| | Policy P.P27: Management of earthworks sites. | New | Support | Part 1 Schedule 1 | | Retain as notified |
| | Policy P.P28: Discharge standard for earthworks sites. | New | Neutral | Part 1 Schedule 1 | | |
| | Policy P.P29: Winter shut down of earthworks. | New | Neutral | Part 1 Schedule 1 | | |
| | Rule P.R1: Point source discharges of specific contaminants – prohibited activity. | New | Neutral | Part 1 Schedule 1 | This may be difficult to enforce and requires no accidental spills from any site. How are natural disasters treated? Also 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. | |
| | Rule P.R2: Stormwater to land – permitted activity. | New | Support | Freshwater | | Retain as notified |

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| Rule P.R3: Stormwater from an existing individual property to surface water or coastal water – permitted activity. | New | Support | Part 1 Schedule 1 | | Retain as notified |
| Rule P.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity. | New | Support | Part 1 Schedule 1 | | Retain as notified |
| Rule P.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity. | New | Amend | Part 1 Schedule 1 | The requirement for hydrological control is onerous for a 30m2 increase or redevelopment of impervious areas. There needs to be a trigger for hydrological control, particularly where hydrological control 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. |
| Rule P.R6: Stormwater from new greenfield impervious surfaces – controlled activity. | New | Neutral | Part 1 Schedule 1 | | |
| Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas– controlled activity. | New | Neutral | Part 1 Schedule 1 | | |
| Rule P.R8: Stormwater from a local authority or state highway network–restricted discretionary activity. | New | Neutral | Part 1 Schedule 1 | | |
| Rule P.R9: Stormwater from new state highways– discretionary activity. | New | Neutral | Part 1 Schedule 1 | | |
| Rule P.R10: Stormwater from new and redeveloped impervious surfaces– discretionary activity. | New | Amend | Part 1 Schedule 1 | Clarification is needed on how an activity can be prohibited under WH.R13 but discretionary under this rule. | Amend rule to clarify how rule applies. |
| Rule P.R11: All other stormwater discharges – non-complying activity. | New | Neutral | Part 1 Schedule 1 | | |
| Rule P.R12 – Stormwater discharges from new unplanned greenfield development – prohibited activity. | New | Neutral | Part 1 Schedule 1 | | |
| Rule P.R22: Earthworks – permitted activity. | New | Support | Freshwater | | |
| Rule P.R23: Earthworks – restricted discretionary activity. | New | Neutral | Part 1 Schedule 1 | | |
| Rule P.R24: Earthworks – non-complying activity. | New | Support | Part 1 Schedule 1 | | |
| Schedule 28: Stormwater Contaminant Treatment. | New | Amend | Part 1 Schedule 1 | The schedule appears to offer only bioretention devices, plus wetlands and swales as treatment options on achieving the target load reduction for copper and zinc. The submitter seeks to ensure that 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. |
| Table 1: Target load Reductions for Copper and Zinc | New | Neutral | Part 1 Schedule 1 | | |
| Table 2: Additional Devices and Specified Load Reductions for Copper and Zinc | New | Neutral | Part 1 Schedule 1 | | |
| Schedule 29: Stormwater Impact Assessments. | New | Amend | Part 1 Schedule 1 | Water sensitive urban design principles are not always possible to implement on existing industrial sites. The schedule has an expectation that these will be used. Clause 8 should not be an obligation in every case. If it meets Freshwater Action Plans then it should not be necessary to consult. | Amend schedule to allow for existing industrial sites where water sensitive design principles cannot always be used. Delete Clause 8. |