

15th December 2023

Greater Wellington Regional Council
Environmental Policy
PO Box 11646
Manners St
WELLINGTON 6142,

Attention: WRC Hearings Advisor

SUBMISSION TO GWRC PLAN CHANGE 1 TO NATURAL RESOURCES PLAN
Form 5, Clause 6 of the First Schedule, RMA

Name of Submitter: Woodridge Holdings Ltd

Address for service: Simplify planning Ltd
21 Severn St
Island Bay
Wellington 6023

Attn: Rhys Phillips

Email: rhys@simplifyplanning.co.nz

Submission on: Natural Resources Plan (NRP) Plan Change 1 (PC1) (by email: regionalplan@gw.govt.nz)

The specific provisions of the plan change that Woodridge Holdings Ltd submission relates, along with the reasons and relief sought are detailed below and in the attached documents. In summary:

1. Entire Document – Consultation

We are very disappointed with the lack of consultation with key landowners and the development community during the preparation of PC1. This lack of consultation and the time of year PC1 was released make it difficult for relevant parties to provide considered comprehensive and detailed feedback.

We request that PC1 be withdrawn, and that WRC consult all relevant parties before releasing a replacement.

2. Entire Document – NPS-UD

Little or no consideration seems to have been given to NPS-Urban Development 2020 (NPS-UD) which has equal status in the RMA plan hierarchy and 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 development as required by the NPS-UD and the restrictive approach WRC is proposing via PC1.

We request that PC1 be withdrawn, and that WRC review and amend all provisions in light of this issue.

3. Entire Document - Consultation

As noted in many places in the attached detailed submission. Our view is that all stakeholders, should be treated equally.

We request that PC1 be withdrawn, review and amend so that all stakeholders, including relevant landowners are treated equally.

4. Entire Document - Vague language

As noted in many places in the attached submission. PC1 uses vague language like "where practicable". This provides no clarity as to when stormwater treatment systems will and won't be required. When is it practical and when it is not?

We request that PC1 be reviewed and that all provisions using vague language be removed.

5. Entire Document – Repetition

As noted in many places in the attached detailed submission. PC1 repeats many of the same objectives, policies and rules with a different heading for a different catchment. This is an unnecessary complication, which could be resolved by having a set of objectives, policies and rules which apply to all catchments and supplementary ones where a specific objective, policy or rule is necessary for a specific catchment.

We seek the withdrawal of PC1, and a review all objectives, policies and rules to remove all duplications by combining them wherever possible.

6. Entire Document – Operation, Maintenance and Ownership

The long-term operational, maintenance and ownership requirements of the stormwater treatment system needed to be considered and determined before PC1 was notified, as it has legal effect upon being released. As a result, we now have a situation where we have no idea whether or not the relevant TA will accept discharges into their existing systems or if they will approve extensions to those systems to accommodate additional development. To shift the risks associated with PC1, TA's could require all new sections of stormwater main to be held in private ownership and maintained by the upstream property owners. This would create numerous technical and legal issues and is something that need to be discussed and addressed.

We seek the withdrawal of PC1 until such time as this issue has been discussed and solutions reached.

7. Entire Document – Connections to TA Networks

Under PC1 where a property connects to a local authority stormwater network, additional connection requirements and authorisations may be required by the network utility operator. We are concerned that TA's will not allow discharges to their network if there is even the slightest risk that the discharge (no matter how small and clean) could make them breach the PC1 requirements in relation to their network.

We seek the withdrawal of PC1 until such time as this issue has been discussed and solutions reached. Alternatively amend PC1 so that TA's are required to accept a discharge which meets the specified standards for a permitted activity or has an appropriate GW resource consent.

8. Entire Document – Water Sensitive Urban Design

PC1 refers to water sensitive urban design but does not include a Water Sensitive Urban Design Guide and as far as we are aware GW has not produced this document. As a result, Council is asking developers via PC1 to implement measures into developments which it has not considered and provided guidance on.

Many 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. As a result, it is important that this document is prepared at the same time as, if not before, PC1 is prepared. Having the rules in place before the guide is prepared makes it very 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.

We seek the withdrawal of PC1, review it and release it again when the Water Sensitive Urban Design Guide has also been prepared, in consultation with the relevant stakeholders.

9. Schedule 30 - Financial contributions

Schedule 30 and all objectives, policies and rules requiring a financial contribution are opposed. These new provisions are in effect an additional tax upon greenfield development. PC1 requires treatment of 85% of the water which falls on a greenfield site, with the treatment level set at that of a raingarden/bioretention device which Table 1 of Schedule 28 states removes 90% of the copper and zinc, in addition to that a requirement not to have unpainted copper or zinc surfaces, and the stormwater being discharged from these sites will be very low in all contaminants.

As noted, in the detailed part of this submission 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 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.

This financial contribution seems to be aimed at ensuring that there are no adverse effects or positive effects, however this is not what the RMA seeks and a development where the effects is less than minor should be consented.

This additional contribution will inevitably flow through to house prices and contribute housing unaffordability. Woodridge already pays a Development Contribution of \$19,357 per EHU.

We request that Schedule 30 and all objectives, policies and rules requiring a financial contribution be deleted.

10. Rules WH.R23 and P.R22 – Rules Not Practical

It will not be possible to comply with these rules as their conditions specify that there should be no discharge of sediment. As a result, earthworks less than 3,000m² will only be possible if you can guarantee that there will be no discharge of sediment, and we can't see anyone taking the risk of WRC taking enforcement action over these small scale earthworks. As a result, the majority small scale earthworks which are currently permitted would need a consent to ensure compliance is not an issue.

Council officers advised at the developer's forum that they are well resourced to accommodate the costs generated by PC1. We know that they are not. For example, Simplify Planning has not submitted an application to GWRC in the past three years but have submitted between 150 and 180 resource consent applications to various TA's in that time, with a majority of those involving some form of earthworks, which would be captured by the PC1 rules, as we could not guarantee no discharge of sediment. So, Simplify Planning alone would be submitting approx. 30 applications per year to GWRC and we are a very small operation.

These rules require a level of treatment that is nearly impossible to achieve, that WRC own ESCP Guidelines don't consider or provide solutions for, and which is greater than that of a permitted stormwater discharge.

We seek the withdraw and redrafting PC1 or the amendment of Rules WH.R23 and P.P22 so that they allow an appropriate level of SS in any stormwater discharge. 50g/m³ to scheduled sites and 100g/m³ to any other water body are noted in WH.R3 but these levels may need to be amended following submission by experts in this field.

11. Specific Objectives, Policies, Rules etc

The attached documents provide more specific discussion about individual Specific Objectives Policies, Rules and the issues we have identified with them. These documents form part of and should be read in conjunction with this covering letter.

We wish to speak at the hearing in support of our submission:

We would consider presenting a joint submission at the hearing with others who make a similar submission.

Dated at Wellington on 15 December 2023



Signature:

Rhys Philips, Senior Planner

For Simplify Planning Ltd on behalf of the submitted Woodridge Holdings Ltd

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

Please enter your details below	
* Submitter Name: Full name, or Name of Organisation / Company	Woodridge Holdings Limited
Contact person for submission: (If different to above)	Simplify Planning Ltd. Attn: Rhys Phillips
Telephone no: (Not required)	210631999
* Address for service: (Email, or physical address) Please note, an <u>email address</u> is the preferred method	21 Severn St Island Bay, Wellington 6023
* I wish to be heard in support of my submission at a hearing	Yes
* 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	A
In providing a submission to Greater Wellington, I agree to having read and understood	
If providing a submission on behalf of a company / organisation I confirm that I have authority to do so:	Rhys Phillips
Date:	15/12/2023
Please enter your feedback in the next worksheet "2) Feedback on Provisions". All of the	

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 .
1 General	General					
Entire document	Entire document		Oppose	N/A	We are very disappointed with the lack of consultation with key landowners and the development community during the preparation of PC1. This lack of consultation and the time of year PC1 was released make it difficult for relevant parties to provide feedback.	Withdraw PC1 and consult all relevant parties before releasing a replacement.
Entire document	Entire document		Oppose	N/A	Little or no consideration seems to have been given to NPS-Urban Development 2020 (NPS-UD) which has equal status in the RMA plan hierarchy and 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 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.
Entire document	Entire document		Oppose	N/A	As noted in many places in the attached detailed submission. PC1 takes an inconsistent approach to consultation, our view is that all stakeholders should have a say.	We request that PC1 be withdrawn, review and amend so that all stakeholders, including relevant landowners our view is that all stakeholders should have a say.
Entire document	Entire document		Oppose	N/A	As noted in many places in the submission below PC1 uses vague language like "where practicable". This provides no clarity as to when stormwater treatment systems will and won't be required. When is it practical and when it is not?	Review all provisions to remove or eliminate vague language.

Entire document	Entire document		Oppose	N/A	<p>As noted in many places in the submission below, PC1 repeats many of the same objectives, policies and rules with a different heading for a different catchment. This is an unnecessary complication that could be resolved by having a set of objectives, policies and rules which apply to all catchments and supplementary ones where a specific objective, policy or rule is necessary for a specific catchment.</p>	<p>Withdraw PC1, review all objectives, policies and rules and remove all duplications by combining them wherever possible.</p>
Rules WH.R23 and P.R22	Rules WH.R23 and P.R22		Oppose	N/A	<p>It will not be possible to comply with these rules as their conditions specify that there should be no discharge of sediment. As a result, earthworks less than 3,000m² will only be possible if you can guarantee that there will be no discharge of sediment, and we can't see anyone taking the risk of WRC taking enforcement action over these small scale earthworks. As a result the majority small scale earthworks which are currently permitted would need a consent to ensure compliance is not an issue.</p> <p>Council officers advised at the developer's forum that they are well resourced to accommodate the costs generated by PC1. We know that they are not. For example, we have not submitted an application to GWRC in the past three years but have submitted between 150 and 180 to various TA's in that time, with a majority of those involving some form of earthworks, which would be captured by the PC1 rules, as we could not guarantee no</p>	<p>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 but these levels may need to be amended following submission by experts in this field.</p>

			<i>Oppose</i>		<p><i>So Simplify Planning alone would be submitting approx. 30 applications per year to GWRC and we are a very small operation.</i></p> <p><i>These rules require a level of treatment that is nearly impossible to achieve, that WRCs own ESCP Guidelines don't consider or provide solutions for, and which is greater than that of a permitted stormwater discharge.</i></p> <p><i>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!</i></p> <p><i>Most sites in Wellington and Porirua are steep and/or impermeable making treatment difficult</i></p>	<i>As Above</i>
Many	Many		<i>Oppose</i>		<p>The long-term operational, maintenance and ownership requirements of the stormwater treatment system needed to be considered and determined before PC1 was notified, as it has legal effect upon being released. As a result, we now have a situation where we have no idea whether or not the relevant TA will accept discharges into their existing systems or if they will approve extensions to those systems to accommodate additional development. To shift the risks associated with PC1, TA's could require all new sections of stormwater main to be held in private ownership and maintained by the upstream property owners. This would create numerous technical and legal issues and is something that need to be discussed and addressed.</p>	<i>Withdraw PC1 and review and amend all provisions in light of this issue.</i>

Many	Many		Oppose		<p><i>Under PC1 where a property connects to a local authority stormwater network, additional connection requirements and authorisations may be required by the network utility operator. We are concerned that TA's will not allow discharges to their network if there is even the slightest risk that the discharge (no matter how small and clean) could make them breach the PC1 requirements in relation to their network</i></p>	<p><i>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.</i></p>
Many	Many		Oppose		<p><i>PC1 refers to water sensitive urban design but does not include a Water Sensitive Urban Design Guide and as far as we are aware GW has not produced this document. As a result, Council is asking developers via PC1 to implement measures into developments which it has not considered and provided guidance on.</i></p> <p><i>Many 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. As a result, it is important that this document is prepared at the same time as if not before PC1 is prepared. Having the rules in place before the guide is prepared makes it very 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.</i></p>	<p><i>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.</i></p>

Many	Financial Contributions		Oppose		<p><i>Schedule 30 and all objectives, policies and rules requiring a financial contribution are opposed. These new provisions are in effect an additional tax upon greenfield development. PC1 requires treatment of 85% of the water which falls on a greenfield site, with the treatment level set at that of a raingarden/bioretenion device which Table 1 of Schedule 28 states removes 90% of the copper and zinc in addition to that, requirement not to have unpainted copper or zinc surfaces, and the stormwater being discharged from these sites will be very low in all contaminants.</i></p> <p><i>As noted, in the detailed part of this submission 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 adverse effects and s108(10)</i></p>	We request that Schedule 30 and all objectives, policies and rules requiring a financial contribution be deleted.
A			as above		This financial contribution seems to be aimed at ensuring that there are no effects or positive effects, however this is not what the RMA seeks and a development where the effects is less than minor should be consented.	As above
2 Interpretation	2.2 Definitions	Amended		Both		
	Earthworks	New	Amend	Part 1 Schedule 1	This additional contribution will inevitably flow	The second definition "For all other whaitua"/catchments should apply across the entire region. Add additional exclusions for activities as appropriate.
	Erosion and sediment management plan	New	Amend	Freshwater	<i>There are definitions for plantation forestry and vegetation clearance on highest erosion risk land, but no definition associated with earthworks generally.</i>	Add a definition for an erosion and sediment control plan for general earthworks.

	Existing wastewater discharge	New	Amend	Part 1 Schedule 1	<i>Council is seeking to apply one definition to two catchments and a different definition to all other catchments. This creates an inequitable and confusing situation where some people in the same community are treated differently. The definition should be the same across the region.</i>	Apply one definition to the entire region.
	Impervious surfaces	New	Amend	Part 1 Schedule 1	<p>Definition includes inconsistencies. For example: Porous or permeable paving 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. Additionally, the following are excluded from the definition of impervious surfaces.</p> <ul style="list-style-type: none"> • Roof areas with rainwater collection and reuse • Any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed) <p>Aren't these the same thing? Further, while KCDC might be happy that their 10,000 Ltr stormwater reuse tanks required by their District Plan have been accounted for, these are not designed to attenuate stormwater flows but to alleviate water supply</p>	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 so that they are not counted as Impervious Surfaces.

	Mechanical land preparation	New	Amend	Freshwater	<p>The definition states that it “has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017” which then requires the reader to look up another document. When the definition below for National Threatened freshwater species states it “Has the same meaning as the National Policy Statement for Freshwater Management 2020:</p> <p>Meaning any indigenous species of flora or fauna that:</p> <p>(a) Relies on water bodies for at least part of its life cycle, and ...”</p> <p>The approach to definitions is inconsistent. Either you reference them and require people to look them up as in the former or you reference them and then include the definition. Council needs to be consistent.</p> <p>In addition to the above, if you are going to reference them and require people to look them up the definition</p>	Consistency in the way all definitions are referenced.
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	Redevelopment	New	Amend	Part 1 Schedule 1	<p><i>The definition of redevelopment should not include the word redevelopment as that is what is being defined. The definition uses the words "existing urbanized property" and "brownfield development" but does not define what these are.</i></p> <p><i>The definition refers to "upgrades to existing roads" but specifically excludes "minor maintenance or repairs to roads, carparking areas, driveways and paving". It's going to be hard to know what is an "upgrade" and what is minor maintenance? Eg: replacing a four way intersection with a roundabout would be considered to be an "upgrading" of the intersection even, but if there is no increase in hard surfacing as a result of this change should it be captured by the rules. Is complete replacement of an existing driveway "minor maintenance"?</i></p> <p><i>The definition does not take into consideration the fact that existing developments have consent or existing use rights and as such should have the</i></p>	<p>Amend definition along the following lines: Is the construction of additional housing or EHU's within and existing urbanized property or widening or extending existing roads or other hard surface areas where more than XXXm2 of additional impervious surface is created.</p> <p>Excludes:</p> <ul style="list-style-type: none"> • 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. • Alterations and additions to existing buildings where there is no overall increase in the existing hard surface areas.
	Stabilisation	New	Amend	Part 1 Schedule 1	<p><i>Council is seeking to apply a definition to part of the region and nothing to the rest. This creates an inequitable and confusing situation where some people in the same community are treated differently from others. The definition should be the same across the region.</i></p> <p><i>The definition should acknowledge that some areas inherently stable without the need to measures to be undertaken, eg: exposed rock surfaces.</i></p>	<p>One definition for the entire region. Amend to acknowledge that some areas are inherently stable and as such do not require stabilisation.</p>

	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)	New	Amend	Freshwater	<p><i>Another example of the inconsistent approach to definitions. Either you reference them and require people to look them up as in this case or you reference them and then include the definition. Council needs to be consistent.</i></p> <p><i>In addition to the above, if you are going reference them and require people to look them up, the definition should include a hyperlink to the definition in the referenced document</i></p>	Consistency in the way all definitions are referenced.
3 Objectives	Amendments to Chapter 3 - Objectives	Not applicable to Whaitua		Part 1 Schedule 1		
	Objective O2	Not applicable to Whaitua	Amend	Part 1 Schedule 1	<p><i>This objective and several other objectives and policies refer 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.</i></p>	<p>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.</p> <p>A</p>
	4.6 Biodiversity, aquatic ecosystem health and mahinga kai.	Amended		Part 1 Schedule 1		
	Policy P30: Biodiversity, aquatic ecosystem health and mahinga kai.	Amended	Amend	Part 1 Schedule 1	<p><i>Policy seems to be missing words, uses vague words and cannot be complied with if there are any indigenous aquatic species and indigenous birds present.</i></p>	<p>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.</p> <p>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 breeding and migration. As a result, if there is any indigenous aquatic species or bird species in the area compliance cannot be achieved. It also uses the vague wording "where practical"</p>
	5.4.8 Damming and diverting water	New		Freshwater		

	Rule R151A: Ongoing diversion of a river – permitted activity.	New	Amend	Freshwater	<p><i>Rule is overly complicated. We do not see any 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. If the diversion is lawfully established, it should not matter when that was done.</i></p> <p><i>In relation to (a). All use of the words “as at the date of this rule becoming operative” in PC1 should be deleted, and a specific date inserted. The date at which the rule becomes operative will be harder and harder to determine as time progresses and as a result will cause confusion. Adding a specific date will address this issue. This change should be made where ever this or a similar referene is used</i></p>	<p>Rule R151A: Ongoing diversion of a river – permitted activity</p> <p>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. In relation to (a).</p> <p>All use of the words “as at the date of this rule becoming operative” in PC1 should be deleted, and a specific date inserted.</p>
6 Other methods	6.16 Freshwater Action Plan programme	New		Freshwater		
	Method M36: Freshwater Action Plan programme.	New	Oppose	Freshwater	<p><i>This method advises that Freshwater Action Plans (FAPs) would be informed by engagement with catchment communities, territorial authorities (TA’s) and stakeholders.</i></p> <p><i>It also states that the FAPs can incorporate new target attribute states (TASs) or environmental outcomes identified by WRC at any time.</i></p> <p><i>The two issues with this are:</i></p> <p><i>FAP should be developed by WRC in consultation with all stakeholders.</i></p> <p><i>The method seems to give Council the ability to amend the FAP without formal consultation with the relevant community. It only refers to changes being “informed by engagement with catchment communities, territorial authorities and stakeholders”. Or view is that formal consultation with all stakeholders, the catchment community and TA should be compulsory before any changes are made to a FAP.</i></p>	<p>Our view is that all stakeholders should have a say.</p> <p>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.</p>

	Method M37: Freshwater Action Plan for the Parangarahu Lakes.	New	Amend	Freshwater	<i>This method does not mention formal consultation with the relevant catchment communities, territorial authorities (TA's) and stakeholders (including landowners) is not mentioned.</i>	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.
	Method M38: Freshwater Action Plan for the Rangituhi catchment.	New	Amend	Freshwater	<i>This method does not mention formal consultation with the relevant catchment communities, territorial authorities (TA's) and stakeholders (including landowners) is not mentioned.</i>	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.
	Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Amend	Part 1 Schedule 1	<i>This method does not mention formal consultation with the relevant catchment communities, territorial authorities (TA's) and stakeholders (including landowners) is not mentioned.</i>	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.
	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Amend	Freshwater	<i>This method advises that the Fish passage Action Plan (FPAP) would be developed. Formal consultation with the relevant catchment communities, territorial authorities (TA's) and stakeholders is not mentioned.</i>	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.
	6.16 Supporting improved water quality outcomes.	New		Part 1 Schedule 1		
8 Whaitua Te Whanganui-a-Tara	8.1 Objectives	New		Both		
	8.2 Policies	New		Both		
	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	New	Amend	Freshwater	<i>This method advises how the Fish passage Action Plan (FPAP) would be developed. Formal consultation with the relevant catchment communities, territorial authorities (TA's) and stakeholders, including landowners is not mentioned.</i>	Amend this and all policies so that FAPs cannot be developed or amended without formal engagement of the relevant stakeholders, catchment communities and TAs.
	Policy WH.P10: Managing adverse effects of stormwater discharges.	New	Amend	Part 1 Schedule 1	<i>Item (c). Once again uses the vague wording of "where practicable". This provides no clarity as to when stormwater treatment systems will and won't be required. When is it practical and when it is not?</i>	Be more specific by removing the words "where practical" as they are vague.

	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	New	Oppose	Part 1 Schedule 1	<p><i>Once again WRC has used vague wording. What does “to the extent practicable” mean? This provides no clarity as to when stormwater treatment systems will and won’t be required. When is it practical and when it is not?</i></p> <p><i>Item (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. This encourages people to do the minimum. Providing an incentive, such as rates relief or reduced financial contribution payments could result in a higher level of treatment.</i></p>	<p>Remove all vague wording and/or advise what “to the extent practicable” means?</p> <p>Provide incentives for treating more than 85% of the mean annual runoff volume of stormwater.</p> <p>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.</p> <p>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.</p>
					<p><i>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”. However, the targeted reduction for sediment zinc and copper in Tables 9.3 is 40% and Scheule 28: Stormwater Containment Treatment state that “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.” With Table 1 showing a 90% reduction.</i></p> <p><i>So Item (a)(ii) is in effect seeking a 90% reduction in copper and zinc discharges from a site to achieve the goal of reducing instream concentrations by 40%. 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. Development achieving more than a 40% reduction as required for their property should be</i></p>	

	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	New	Oppose	Part 1 Schedule 1	<i>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. This encourages people to do the minimum. Providing an incentive, such as rates relief or reduced financial contribution payments could result in a higher level of treatment.</i>	Provide incentives for treating more than 85% of the mean annual runoff volume of stormwater.
	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	New	Oppose	Part 1 Schedule 1	<i>The new policy seeks to avoid stormwater discharges from unplanned green field development. 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. This draconian approach effectively ring-fences the City and provides an urban fence that could not be breached. Despite the statement in the policy a plan change could be sought, we consider it is very unlikely GWRC would ever support such an application. This approach flies in the face of the local authorities' responsibility to provide for their own growth. The policy is considered a back-door way of achieving a very specific and unreasonable stormwater management approach. As such we request the Policy be deleted</i>	Delete
	8.2.4 Rural land use and earthworks	New		Both		
	Policy WH.P31: Winter shut down of earthworks.	New	Oppose	Part 1 Schedule 1	<i>This policy is not effects based. Yes, there is greater potential for earthworks to have negative adverse effects during the winter period between 1 June and 30 September and it is not advisable to operate during that time. However, it does not automatically follow that every earthworks project over 3,000m2 will have negative adverse effects if works are underway during this period. Each job should be treated on its merits and conditioned accordingly</i>	Delete entirely
	8.3 Rules	New		Both		
	8.3.2 Stormwater	New		Both		

	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	New	Oppose	Part 1 Schedule 1	<p><i> Ignores the landowners existing use rights. Eg: If you have 1,200m2 of impervious surfaces and you redevelop a site without increasing the level of impervious surfaces there would be no additional adverse effects upon the environment and the development should not have to provide any hydrological controls or additional treatment.</i></p> <p><i> Is this rule relevant to sites which have >1,000m2 of impervious surfaces before redevelopment and <1,000m2 of impervious surfaces after development? Item (c)(ii) does not align with WWL Acceptable Solution V4 which requires rainwater tanks for new roof areas >40m2 (Table 1-1)</i></p>	Remove all requirements to provide hydrological controls the area of impervious surfaces is reduced as part of a development. Item (c)(ii) with WWL Acceptable Solution V4 by increasing the area specified to 40m2.
	Rule WH.R6: Stormwater from new greenfield impervious surfaces – controlled activity.	New	Oppose	Part 1 Schedule 1	<p><i> Is Rule WH.R6 necessary? 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. 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. Yet 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. As a result, two controlled activity rules apply to Greenfield Developments where 1,000m2 and 3,000m2 of impervious surfaces are created.</i></p> <p><i> Controlled Rule WH.R6 at item (b) references permitted Rule WH.R6. 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</i></p>	Remove all requirements to provide hydrological controls if the area of impervious surfaces is reduced as part of a development. Item (c)(ii) with WWL Acceptable Solution V4 by increasing the area specified to 40m2.

	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas – controlled activity.	New	Amend	Part 1 Schedule 1	<i>Remove all vague wording and/or advise what “best practicable option” means? Provide incentives for treating more than 85% of the mean annual runoff volume of stormwater.</i>	Remove all vague wording and/or advise what “best practicable option” means? Provide incentives for treating more than 85% of the mean annual runoff volume of stormwater.
	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces – discretionary activity.	New	Amend	Part 1 Schedule 1	<i>Provide incentives for treating more than 85% of the mean annual runoff volume of stormwater.</i>	Provide incentives for treating more than 85% of the mean annual runoff volume of stormwater.
	Rule WH.R13: Stormwater from new unplanned greenfield development – prohibited activity.	New	Oppose	Part 1 Schedule 1	<i>The RMA does not stipulate that a plan change is required to develop land for a land use it is not currently zoned for. As a result, this process can be progressed either via a plan change or via a resource consent application. 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. Making them a discretionary activity would result in all such any land use consent application needing a WRC resource consent and the potential adverse effects of these development upon the environment can be considered via that consent</i>	Amend so that unplanned greenfield developments area a discretionary activity.
	8.3.5 Earthworks	New		Both		

	Rule WH.R23: Earthworks – permitted activity.	New	Amend	Freshwater	<p><i>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. As a result, nearly all small scale earthworks which are currently permitted would require a WRC consent.</i></p> <p><i>This rule requires a level of treatment that is greater than that permitted under WH.R3. Which permits concentrations of suspended solids (SS) of 50g/m³ to Schedule A sites and 100g/m³ to any other water body. Presumably this level of discharge is permitted as all land has some level of discharge. However, earthworks are not allowed any discharge. So 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!</i></p> <p><i>Most sites in Wellington and Porirua</i></p>	Amend Items (c)(1v) and (c)(v) so that they allow an appropriate level of SS ion any stormwater discharge. 50g/m ³ to Schedule A sites and 100g/m ³ to any other water body are noted in WH.R3 but these leels may need to be amended following submission by experts in this field.
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	Rule WH.R24: Earthworks – restricted discretionary activity.	New	Amend	Part 1 Schedule 1	<i>Yes, there is greater potential for earthworks to have negative adverse effects during the winter period between 1 June and 30 September and it is not advisable to operate during that time. However, it does not automatically follow that all earthworks underway during this period will have negative effects. 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”. One of the matters for discretion is “The proportion of unestablished land in the catchment.” This is vague and gives an applicant no idea what % of disturbance is likely to be acceptable per catchment. It also makes the applicant reliant upon the actions of others. For example: If Council sets a % limit for a catchment, and that is exceeded because there are multiple developments in the area, how does Council decide who goes first? First in first served? What happens if the</i>	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.
Chapter 9 Te Awarua-o-Porirua Whaitua	9.1 Objectives	New		Both		
	9.2 Policies	New		Both		
	9.2.1 Ecosystem health and water quality	New		Both		
	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	New	Amend	Part 1 Schedule 1	<i>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.</i>	Amend all rules to that they ‘encourage’ and do not ‘require’ developmetns to reduce urban contaminant loads in accordance with this policy.
	Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	New	Amend	Freshwater	<i>This policy advises how FAPs would be developed. Formal consultation with the relevant catchment communities, territorial authorities (TA’s) and stakeholders, including relevant landowners is not mentioned.</i>	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.
	8.2.1 Discharges to water	New		Both		

	Policy P.P6: Point source discharges.	New	Oppose	Part 1 Schedule 1	<p><i>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)”.</i></p> <p><i>Is this policy not contrary to the rules? Rule WH.R5 permits stormwater discharges from new and redeveloped impervious surfaces <1,000m2 where the concentration of SS don’t exceed 50g/m3 where the discharge is to specified sites and 100g/m3 where the discharge enters any other water body. Will this permitted discharge and any discharge requiring a consent not, 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.</i></p>	<p>Amend the policy so that developments do not automatically contravene it even if permitted.</p> <p>Use consistent understandable terminology.</p> <p>Clarify the applicability of the policy.</p>
					<p><i>P.P6(b)(i) refers to “upgrading the discharge” while P.P6(c)(i) refers to “improving the discharge”. Constant terminology should be used.</i></p> <p><i>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. It’s 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? If that is the case will the TA just refuse to accept any additional inputs, even if they comply with WH.R4 for fee of not meeting the discharge standards. If that occurs all development will cease and property process will go through the roof as there will be no additional supply for the region’s growing population.</i></p>	

	Policy P.P7 Discharges to groundwater.	New	Oppose	Freshwater	<i>This policy and specifically the words "shall not degrade the quality of groundwater" cannot be complied with. All stormwater discharges include some level of contamination and as so as that water meets the ground water this policy would be contravened.</i>	Amend the policy so that it can be an be met.
	9.2.2 Stormwater	New		Part 1 Schedule 1		
	Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	New	Amend	Part 1 Schedule 1	<i>P.P9 is nearly and exact replica of WH.P9. The could be rewritten into one policy.</i>	Delete and rewrite one policiy.
	Policy P.P10: Managing adverse effects of stormwater discharges.	New	Amend	Part 1 Schedule 1	<i>Are P.P10(a) and P.P10(c) not covering the same ground in a slightly different wording. Both also use vague wording "to the extent practicable" and "where practicable".</i>	Review to simplify and remove vague wording or provide a definition for "to the extent practicable" and "where practicable".
	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises	New	Amend	Part 1 Schedule 2	P.P11 is an exact replica of WH.P11 combined into one.	combined into one
	Policy P.P12: Managing stormwater network discharges through a Stormwater Management Strategy.	New	Amend	Part 1 Schedule 1	<i>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. Is this not inconsistent with Table 933 which specifies 40% reduction for both?</i>	Fix this inconsistency and review PC1 for other similar inconsistencies.
	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	New	Oppose	Part 1 Schedule 1	The new policy supports the associated rule that 85% of mean annual runoff volume from new impervious surfaces must be treated. This is considered to be excessive and unreasonable.	Delete

	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	New	Oppose	Part 1 Schedule 1	<i>The new policy seeks to avoid stormwater discharges from unplanned green field development. 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. This draconian approach effectively ring-fences the City and provides an urban fence that could not be breached. Despite the statement in the policy a plan change could be sought, we consider it is very unlikely GWRC would ever support such an application. This approach flies in the face of the local authorities' responsibility to provide for their own growth. The policy is considered a back-door way of achieving a very specific and unreasonable stormwater management approach. As such we request the Policy be deleted.</i>	Delete
A	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	New	Select stance	Part 1 Schedule 1	<i>as above</i>	As above
	9.2.4 Rural Land Uses and Earthworks	New		Both		
	Policy P.P28: Discharge standard for earthworks sites.	New	Amend	Part 1 Schedule 1	<i>This policy relates to the discharge standards for earthworks sites and makes reference to discharge standard for turbidity to be measured using a new method of Total Suspended Solids. This test requires a laboratory to measure and cannot readily be done in the field. As such we request the Policy be amended to refer to an NTU standard.</i>	We request the Policy be amended to refer to an NTU standard.

	Policy P.P29: Winter shut down of earthworks.	New	Oppose	Part 1 Schedule 1	<i>This policy is not effects based. Yes, there is greater potential for earthworks to have negative adverse effects during the winter period between 1 June and 30 September and it is not advisable to operate during that time. However, it does not automatically follow that every earthworks project over 3,000m2 will have negative adverse effects if works are underway during this period. Each job should be treated on its merits and conditioned accordinaly</i>	Delete
	9.3 Rules	New		Both		
	9.3.1 Discharges of contaminants	New		Both		
	Rule P.R2: Stormwater to land – permitted activity.	New	Amend	Freshwater	<i>P.R2 repeats WH.R2 and as such is unnecessary and should be combined into one. If it is not our comments regarding WH.R2 apply.</i>	Combine into one rule.
	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water – permitted activity.	New	Amend	Part 1 Schedule 1	<i>P.R3 repeats WH.R3 and as such is unnecessary and should be combined into one. If it is not our comments regarding WH.R3 apply.</i>	Combine into one rule.
	Rule P.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity.	New	Amend	Part 1 Schedule 1	<i>P.R4 repeats WH.R4 and as such is unnecessary and should be combined into one. If it is not our comments regarding WH.R4 apply.</i>	Combine into one rule.
	Rule P.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	New	Amend	Part 1 Schedule 1	<i>P.R5 repeats WH.R5 and as such is unnecessary and should be combined into one. If it is not our comments regarding WH.R5 apply.</i>	Combine into one rule.
	Rule P.R6: Stormwater from new greenfield impervious surfaces – controlled activity.	New	Amend	Part 1 Schedule 1	<i>P.R6 repeats WH.R6 and as such is unnecessary and should be combined into one. If it is not our comments regarding WH.R6 apply. Under (b) this rules refers to itself.</i>	Combine into one rule.
	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas– controlled activity.	New	Amend	Part 1 Schedule 1	<i>P.R7 repeats WH.R7 and as such is unnecessary and should be combined into one. If it is not comments regarding WH.R7 apply. (b) refers to activities permitted under P.R6 when P.R5 is the permitted rule.</i>	Combine into one rule.
	Rule P.R8: Stormwater from a local authority or state highway network–restricted discretionary activity.	New	Amend	Part 1 Schedule 1	<i>P.R8 repeats WH.R9 and as such is unnecessary and should be combined into one. If it is not our comments regarding WH.R9 apply.</i>	Combine into one rule.

	Rule P.R9: Stormwater from new state highways– discretionary activity.	New	Amend	Part 1 Schedule 1	<i>P.R9 repeats WH.R10 and as such is unnecessary and should be combined into one. If it is not our comments regarding WH.R10 apply.</i>	Combine into one rule.
	Rule P.R10: Stormwater from new and redeveloped impervious surfaces– discretionary activity.	New	Amend	Part 1 Schedule 1	<i>P.R10 repeats WH.R11 and as such is unnecessary and should be combined into one. If it is not our comments regarding WH.R11 apply.</i>	Combine into one rule.
	Rule P.R11: All other stormwater discharges – non-complying activity.	New	Amend	Part 1 Schedule 1	<i>P.R11 repeats WH.R12 and as such is unnecessary and should be combined into one. If it is not our comments regarding WH.R12 apply.</i>	Combine into one rule.
	Rule P.R12 – Stormwater discharges from new unplanned greenfield development – prohibited activity.	New	Amend	Part 1 Schedule 1	<i>P.R12 repeats WH.R13 and as such is unnecessary and should be combined into one. If it is not our comments regarding WH.R13 apply.</i>	Combine into one rule.
	9.3.3 Wastewater	New		Part 1 Schedule 1		
	Rule P.R13: Wastewater network catchment discharges to water – restricted discretionary activity.	New	Amend	Part 1 Schedule 1	<i>P.R13 repeats WH.R14 but with a slightly better layout. Combine into one.</i>	Combine into one policy
	Rule P.R14: Existing wastewater discharges from a treatment plant to coastal and freshwater – discretionary activity.	New	Amend	Part 1 Schedule 1	<i>P.R14 repeats WH.R15 but with a slightly different heading. Delete and amend WH.R14 to include the P.R13 format.</i>	Combine into one policy
	Rule P.R15: All other discharges of wastewater – non-complying activity.	New	Amend	Part 1 Schedule 1	<i>P.R15 repeats WH.R16 and as such is unnecessary and should be combined into one.</i>	Combine into one policy
	9.3.4 Land uses	New		Freshwater		
	Rule P.R16: Vegetation clearance on highest erosion risk land– permitted activity.	New	Amend	Freshwater	<i>P.R16 repeats WH.R17 and as such is unnecessary and should be deleted.</i>	Combine into one rule.
	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.	New	Amend	Freshwater	<i>P.R17 repeats WH.R18 and as such is unnecessary and should be combined into one</i>	Combine into one rule.
	Rule P.R18: Vegetation clearance – discretionary activity.	New	Amend	Freshwater	<i>P.R17 repeats WH.R18 and as such is unnecessary and should be combined into one.</i>	Combine into one rule.
	Rule P.R19: Plantation forestry – controlled activity.	New	Amend	Freshwater	<i>P.R196 repeats WH.R20 and as such is unnecessary and should be deleted.</i>	Combine into one rule.
	Rule P.R20: Plantation forestry – discretionary activity.	New	Amend	Freshwater	<i>P.R20 repeats WH.R21 and as such is unnecessary and should be combined into one.</i>	Combine into one rule.
	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.	New	Amend	Freshwater	<i>P.R21 repeats WH.R22 and as such is unnecessary and should be combined into one.</i>	Combine into one rule.
	9.3.5 Earthworks	New		Both		

	Rule P.R22: Earthworks – permitted activity.	New	Amend	Freshwater	<i>P.R22 repeats WH.R23 and as such is unnecessary and should be combined into one. If it is not our comments regarding WH.R23 apply.</i>	Combine into one rule.
	Rule P.R23: Earthworks – restricted discretionary activity.	New	Amend	Part 1 Schedule 1	<i>P.R23 repeats WH.R24 and as such is unnecessary and should be deleted. If it is not deleted our comments regarding WH.R24 apply.</i>	Combine into one rule.
	Rule P.R24: Earthworks – non-complying activity.	New	Amend	Part 1 Schedule 1	<i>P.R24 repeats WH.R25 and as such is unnecessary and should be combined into one. If it is not our comments regarding WH.R25 apply.</i>	Combine into one rule.
	9.3.6 Nutrients and sediment from pastoral farming	New		Freshwater		
	Rule P.R25: Farming activities on properties of between 4 hectares and 20 hectares – permitted activity.	New	Amend	Freshwater	<i>P.R25 repeats WH.R26 and as such is unnecessary and should be combined into one.</i>	Combine into one rule.
	Rule P.R26: Farming activities on 20 hectares or more of land – permitted activity.	New	Amend	Freshwater	<i>P.R26 repeats WH.R27 and as such is unnecessary and should be deleted.</i>	Combine into one rule.
	Rule P.R27: The use of land for farming activities – discretionary activity.	New	Amend	Freshwater	<i>P.R27 repeats WH.R30 and as such is unnecessary and should be combined into one.</i>	Combine into one rule.
	Rule P.R28: Change of rural land use – discretionary activity.	New	Amend	Freshwater	<i>P.R28 repeats WH.R31 and as such is unnecessary and should be combined into one.</i>	Combine into one rule.
	Rule P.R29: Farming activities – non-complying activity.	New	Amend	Freshwater	<i>P.R29 repeats WH.R32 and as such is unnecessary and should be combined into one.</i>	Combine into one rule.
12 Schedules		Amended/New		Both		
	Schedule A: Outstanding water bodies	New	Amend	Part 1 Schedule 1	<p><i>All unnamed streams in all schedules should be given a reference (eg: Unnamed Stream A) and mapped, including provision of a hyperlink to the coordinates so that the location can be more readily identified. It's not sufficient in today's age of digital age to state coordinate alone.</i></p> <p><i>All streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are. Not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info.</i></p>	<p><i>All unnamed streams in all schedules should be given a reference (eg: Unnamed Stream A) and mapped, including provision of a hyperlink to the coordinates so that the location can be more readily identified. It's not sufficient in today's age of digital age to state coordinate alone.</i></p> <p><i>All streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are. Not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info.</i></p>

	Schedule A2: Lakes with outstanding indigenous ecosystem values.	New	Amend	Part 1 Schedule 1	<p><i>All unnamed streams in all schedules should be given a reference (eg: Unnamed Stream A) and mapped, including provision of a hyperlink to the coordinates so that the location can be more readily identified. It's not sufficient in today's age of digital age to state coordinate alone.</i></p> <p><i>All streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are. Not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info.</i></p>	<p><i>All unnamed streams in all schedules should be given a reference (eg: Unnamed Stream A) and mapped, including provision of a hyperlink to the coordinates so that the location can be more readily identified. It's not sufficient in today's age of digital age to state coordinate alone.</i></p> <p><i>All streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are. Not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info.</i></p>
	Schedule F: Ecosystems and habitats with significant indigenous biodiversity values.	Amended	Amend	Part 1 Schedule 1	<p><i>All unnamed streams in all schedules should be given a reference (eg: Unnamed Stream A) and mapped, including provision of a hyperlink to the coordinates so that the location can be more readily identified. It's not sufficient in today's age of digital age to state coordinate alone.</i></p> <p><i>All streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are. Not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info.</i></p>	<p><i>All unnamed streams in all schedules should be given a reference (eg: Unnamed Stream A) and mapped, including provision of a hyperlink to the coordinates so that the location can be more readily identified. It's not sufficient in today's age of digital age to state coordinate alone.</i></p> <p><i>All streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are. Not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info.</i></p>

	Schedule F1: Rivers and lakes with significant indigenous ecosystems.	Amended	Amend	Part 1 Schedule 1	<p><i>All unnamed streams in all schedules should be given a reference (eg: Unnamed Stream A) and mapped, including provision of a hyperlink to the coordinates so that the location can be more readily identified. It's not sufficient in today's age of digital age to state coordinate alone.</i></p> <p><i>All streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are. Not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info</i></p>	<p><i>All unnamed streams in all schedules should be given a reference (eg: Unnamed Stream A) and mapped, including provision of a hyperlink to the coordinates so that the location can be more readily identified. It's not sufficient in today's age of digital age to state coordinate alone.</i></p> <p><i>All streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are. Not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info.</i></p>
	Schedule F2a: Significant habitats for indigenous birds in rivers.	Amended	Amend	Part 1 Schedule 1	<p><i>All unnamed streams in all schedules should be given a reference (eg: Unnamed Stream A) and mapped, including provision of a hyperlink to the coordinates so that the location can be more readily identified. It's not sufficient in today's age of digital age to state coordinate alone.</i></p> <p><i>All streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are. Not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info</i></p>	<p><i>All unnamed streams in all schedules should be given a reference (eg: Unnamed Stream A) and mapped, including provision of a hyperlink to the coordinates so that the location can be more readily identified. It's not sufficient in today's age of digital age to state coordinate alone.</i></p> <p><i>All streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are. Not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info.</i></p>

	Schedule F2b: Significant habitats for indigenous birds in lakes.	Amended	Amend	Part 1 Schedule 1	<p><i>All unnamed streams in all schedules should be given a reference (eg: Unnamed Stream A) and mapped, including provision of a hyperlink to the coordinates so that the location can be more readily identified. It's not sufficient in today's age of digital age to state coordinate alone.</i></p> <p><i>All streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are. Not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info</i></p>	<p><i>All unnamed streams in all schedules should be given a reference (eg: Unnamed Stream A) and mapped, including provision of a hyperlink to the coordinates so that the location can be more readily identified. It's not sufficient in today's age of digital age to state coordinate alone.</i></p> <p><i>All streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are. Not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info.</i></p>
	Schedule F2c: Significant habitats for indigenous birds in the coastal marine area.	Amended	Amend	Part 1 Schedule 1	<p><i>All unnamed streams in all schedules should be given a reference (eg: Unnamed Stream A) and mapped, including provision of a hyperlink to the coordinates so that the location can be more readily identified. It's not sufficient in today's age of digital age to state coordinate alone.</i></p> <p><i>All streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are. Not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info</i></p>	<p><i>All unnamed streams in all schedules should be given a reference (eg: Unnamed Stream A) and mapped, including provision of a hyperlink to the coordinates so that the location can be more readily identified. It's not sufficient in today's age of digital age to state coordinate alone.</i></p> <p><i>All streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are. Not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info.</i></p>

	Schedule F4: Sites with significant indigenous biodiversity values in the coastal marine area.	Amended	Amend	Part 1 Schedule 1	<p><i>All unnamed streams in all schedules should be given a reference (eg: Unnamed Stream A) and mapped, including provision of a hyperlink to the coordinates so that the location can be more readily identified. It's not sufficient in today's age of digital age to state coordinate alone.</i></p> <p><i>All streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are. Not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info.</i></p>	<p><i>All unnamed streams in all schedules should be given a reference (eg: Unnamed Stream A) and mapped, including provision of a hyperlink to the coordinates so that the location can be more readily identified. It's not sufficient in today's age of digital age to state coordinate alone.</i></p> <p><i>All streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are. Not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info.</i></p>
	Schedule F5: Habitats with significant indigenous biodiversity values in the coastal marine area.	Amended	Amend	Part 1 Schedule 1	<p><i>All unnamed streams in all schedules should be given a reference (eg: Unnamed Stream A) and mapped, including provision of a hyperlink to the coordinates so that the location can be more readily identified. It's not sufficient in today's age of digital age to state coordinate alone.</i></p> <p><i>All streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are. Not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info.</i></p>	<p><i>All unnamed streams in all schedules should be given a reference (eg: Unnamed Stream A) and mapped, including provision of a hyperlink to the coordinates so that the location can be more readily identified. It's not sufficient in today's age of digital age to state coordinate alone.</i></p> <p><i>All streams with names should also be mapped and provided with a hyperlink so that it's easier to determine where they are. Not everyone knows individual stream names and where they are and it can be difficult to determine their locations using the available online info.</i></p>
	B Freshwater Action Plan requirements.	New	Amend	Freshwater	<i>FAP should be developed by WRC in consultation with all stakeholders</i>	Amend so that all stakeholders are recognised as being important to the development and implementation of FAP's.

	B3 Necessary actions.	New	Amend	Freshwater	<i>B3.(b) states that GW will “Investigate opportunities for rates relief or other forms of financial support for private landowners to promote and accelerate revegetation of highest erosion risk land (plantation forestry), highest erosion risk land (pasture), high erosion risk land (pasture).” What 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</i>	Consider rates relief and other forms of financial support for a wider range of actions which will improve water quality.
	Table 1: Target load Reductions for Copper and Zinc	New	Oppose	Part 1 Schedule 1	<i>The target load reductions for Copper and Zinc in Table 1 are 90%. However, the targeted reduction for zinc and copper in Tables 9.3 is 40%. It seems that Council is seeking a 90% reduction in copper and zinc discharges from a site to achieve the goal of reducing instream concentrations by 40%. 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. 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.</i>	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.

	Schedule 29: Stormwater Impact Assessments.	New	Oppose	Part 1 Schedule 1	<p><i>Clause 8 requires specifies that SIA's need to include Cultural considerations: to be informed by engagement with mana whenua." In effect this makes consultation with Mana Whenua compulsory.</i></p> <p><i>Clause 6(1)(f) of the Fourth Schedule of the Act states that an AEE should include an "identification of the persons affected by the activity, any consultation undertaken, and any response to the views of any person consulted". To avoid doubt section clause 6(3) states that subclause (6)(1)(f) obliges an applicant to report as to the persons identified as being affected by the proposal but does not oblige the applicant to consult with any person or create any ground for expecting that the applicant will consult any person.</i></p> <p><i>As this cause is in conflict with the RMA it should be amended so that it does not require consultation with mana whenua</i></p>	Amend this calsue to that it is not in conflict with the RMA.
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	A Context	New	Amend	Part 1 Schedule 1	<p><i>The wording of the first paragraph referencing is slightly misleading. It uses the word "may" but s10 states that "A108(10) a financial contribution unless—</i></p> <p><i>(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); and</i></p> <p><i>(b) the level of contribution is determined in the manner described in the plan or proposed plan."</i></p> <p><i>In the third paragraph, while the NPS-FW requires water quality to be maintained or improved, s10 of the RMA 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</i></p>	Amend text accordingly
	B Purpose	New	Oppose	Part 1 Schedule 1	<p><i>If brownfield development, which have existing use rights, are improving their discharges during redevelopment they should get a payment/rates reduction/credit?</i></p>	Consider financial incentives for existing property owners who install water attenuation and or treatment devices.

	C Definition of an Equivalent Household Unit	New	Oppose	Part 1 Schedule 1	<p><i>These paragraphs are confusing. The first paragraph refers to a residential EHU being “an average-sized residential unit”. But there is no specific definition of what is average sized or a m2 size specified. Has this been calculated? We note that it is likely to vary from city to city. 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 ... “every 100m2 of roofing or roading/hardstand area is deemed to create one unit of impact, rather than using the EHU unit of measure used for residential development.” So, is 100m2 one EHU or not?</i></p>	Amend to provide clarity as to what is an EHU and what is not. Also clarify how EHU are applied to hard surfaces that are not roofs eg: roads, onsite paving and driveways, in all areas.
	Tale D2. Financial contribution calculations for non-residential greenfield development and new roads/state highways	New	Amend	Part 1 Schedule 1	<p><i>The note under this table states that “Financial contributions shall be imposed as a condition of consent and will be collected prior to the consent being given effect to.”</i></p> <p><i>When exactly this payment is to be made needs to be defined. As TA’s know paying all financial/development contributions up front for an entire development can make the development uneconomic as the initial stages of a development often fund the later stages with any profit is typically made near the completion of the development. TA financial/development contributions are typically paid when a developer applies for s224c certification or when a building consent is to be issued. As the proposed financial contributions are to fund improvements to water quality etc they should only be payable when there is an impact. For example, subdivisions could pay as s224c certifications, for the new areas of hard</i></p>	Consider and amend accordingly

	Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	New	Amend	Part 1 Schedule 1	<i>Item 11 states that “for discharges into the stormwater network, identify any requirements for any connections into the stormwater network.” As noted previously we are 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</i>	Provide clarity that TA’s will have to accept complaint discharges or discharges approved via a NRP consent.
13 Maps		New		Both		
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4).	New	Amend	Part 1 Schedule 1	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 1: (Kāpiti).	New	Amend	Part 1 Schedule 1	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 2: (Wellington Harbour).	New	Amend	Part 1 Schedule 1	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 2: Te Awarua-o-Porirua.	New	Amend	Part 1 Schedule 1	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.
	Map 77: Habitats of nationally threatened freshwater species – Te Awarua-o-Porirua and Te Whanganui-a-Tara (Schedule F1).	New	Amend	Part 1 Schedule 1	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.

	Map 78: Part freshwater management units and target attribute state sites (rivers) – Te Awarua-o-Porirua.	New	Amend	Freshwater	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.
	Map 79: Part freshwater management units and target attribute state sites (rivers) – Te Whanganui-a-Tara.	New	Amend	Freshwater	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.
	Map 80: Part freshwater management units and target attribute state sites (lakes) – Te Whanganui-a-Tara.	New	Amend	Freshwater	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.
	Map 81: Rivers and catchment management units for water takes – Te Awarua-o-Porirua.	New	Amend	Freshwater	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.
	Map 82: Coastal water management units – Te Awarua-o-Porirua.	New	Amend	Part 1 Schedule 1	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.
	Map 83: Coastal water management units – Te Whanganui-a-Tara.	New	Amend	Part 1 Schedule 1	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.

	Map 84: Harbour arm catchments – Te Awarua-o-Porirua.	New	Amend	Part 1 Schedule 1	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.
	Map 85: Primary contact sites – Te Whanganui-a-Tara.	New	Amend	Freshwater	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.
	Map 86: Unplanned greenfield areas – Porirua City Council.	New	Amend	Part 1 Schedule 1	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.
	Map 87: Unplanned greenfield areas – Wellington City Council.	New	Amend	Part 1 Schedule 1	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.
	Map 88: Unplanned greenfield areas – Upper Hutt City Council.	New	Amend	Part 1 Schedule 1	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.
	Map 89: Unplanned greenfield areas – Hutt City Council.	New	Amend	Part 1 Schedule 1	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.

	Map 90: Highest and high erosion risk land (Pasture) – Te Awarua-o-Porirua.	New	Amend	Freshwater	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.
	Map 91: Highest erosion risk land (Woody vegetation) – Te Awarua-o-Porirua.	New	Amend	Freshwater	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.
	Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua.	New	Amend	Freshwater	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.
	Map 93: Highest and high erosion risk land (Pasture) – Te Whanganui-a-Tara.	New	Amend	Freshwater	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.
	Map 94: Highest erosion risk land (Woody vegetationclearance) – Te Whanganui-a-Tara.	New	Amend	Freshwater	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.
	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.	New	Amend	Freshwater	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.

	Map 96: Mākara catchment.	New	Amend	Freshwater	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.
	Map 97: Mangaroa catchment.	New	Amend	Freshwater	<i>All maps are fairly basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries. Hopefully this will be resolved via the provision of TA District Plan style online maps.</i>	Provide TA District Plan style online maps.