

# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Addendum1 to Summary of Decisions Requested



**Table 1: Submission points amended in the Summary of Decisions Requested:**

Correctios to the Summary of Decisions Requested are recorded in red text below and should be read in conjunction with the [Summary of Decisions requested \(by Provision\)](#), or [Summary of Decisions requested \(by Submitter\)](#) which was notified on Monday 12 February 2024.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
<b>S37 – Donald Skerman</b>					
S37.004	13 Maps	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Oppose	Upper Hutt City Council is in the process of changing the zoning of this land to Natural Open Space (Plan change 49 Variation 1)	<del>Seeks the deletion</del> The section to the North of the paper road extending from Kiln St known as Pt. Sec 82 or Silverstream Spur should be removed from the "Planned/existing urban areas"
<b>S120 - Akatarawa Valley Residents - John Van Nortwick &amp; Jill Van Nortwick</b>					
S120.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S121 - Akatarawa Valley Residents - Karen Wallace &amp; Mark Robbins</b>					
S121.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S122 - Akatarawa Valley Residents - Paul Lambert &amp; Steph Lambert</b>					
S122.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	
<b>S123 - Akatarawa Valley Residents - Sandy Cooper</b>					
S123.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S124 - Akatarawa Valley Residents - Fredrick Steensma</b>					
S124.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S125 - Akatarawa Valley Residents - Shoshanah (Shosh) Phillips</b>					
S125.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S126 - Akatarawa Valley Residents - Russell Judd &amp; Cecile Judd</b>					
S126.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S127 - Akatarawa Valley Residents - Johanna Overdiep &amp; Steve Sturgess</b>					
S127.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				biodiversity.	
<b>S128 - Akatarawa Valley Residents - Joany Grima &amp; Allen Rockell</b>					
S128.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S129 - Akatarawa Valley Residents - Keith Budd &amp; Liz Budd</b>					
S129.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S130 - Akatarawa Valley Residents - Pete Clark</b>					
S130.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S131 - Akatarawa Valley Residents - Gillian Taylor &amp; Chris Taylor</b>					
S131.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S132 - Akatarawa Valley Residents - Hannah Dawson &amp; Ryan Dawson</b>					
S132.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S133 - Akatarawa Valley Residents - Len Drabble</b>					

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S133.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S134 - Akatarawa Valley Residents - Graeme Allan</b>					
S134.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S135 - Akatarawa Valley Residents - Joshua Wood</b>					
S135.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S136 - Akatarawa Valley Residents - Micayla Wood</b>					
S136.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S137 - Akatarawa Valley Residents - Jonathan Wood</b>					
S137.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S138 - Akatarawa Valley Residents - Tony Wood &amp; Helen Wood</b>					
S138.007	General	General	Oppose	Notes that residents deal with incursion of pest	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land

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	comments	comments - overall		species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S139 - Akatarawa Valley Residents - Glenda Arnold</b>					
S139.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S140 - Akatarawa Valley Residents - Janet Collins</b>					
S140.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S141 - Akatarawa Valley Residents - George Hare</b>					
S141.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S142 - Akatarawa Valley Residents - Paul Arnold</b>					
S142.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S143 - Akatarawa Valley Residents - Chilly Brook Trust (Mary Redington)</b>					
S143.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.

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				pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	
<b>S144 - Akatarawa Valley Residents - Gaylene Ward &amp; Mike Ward</b>					
S144.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S145 - Akatarawa Valley Residents - Nigel Parry &amp; Judy Parry</b>					
S145.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S146 - Akatarawa Valley Residents - Leanna Jackson &amp; Carl Burns</b>					
S146.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S147 - Akatarawa Valley Residents - Joline Fowke &amp; Owen Fowke</b>					
S147.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S148 - Akatarawa Valley Residents - Paul Baker</b>					
S148.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.

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				biodiversity.	
<b>S149 - Akatarawa Valley Residents - Allan MacDonald</b>					
S149.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S150 - Akatarawa Valley Residents - Phyllis Strachan</b>					
S150.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S152 - Akatarawa Valley Residents - John Raffan &amp; Heather Raffan</b>					
S152.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S153 - Akatarawa Valley Residents - Redington Family Trust (Mary Redington)</b>					
S153.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S154 - Akatarawa Valley Residents - Ash Barker &amp; Kes Barker</b>					
S154.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S155 - Akatarawa Valley Residents - Susan Davidson</b>					

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S155.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S156 - Akatarawa Valley Residents - John Bryce</b>					
S156.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S157 - Akatarawa Valley Residents - Dr Patricia Laing</b>					
S157.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S158 - Akatarawa Valley Residents - Erica Dawson</b>					
S158.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S159 - Akatarawa Valley Residents - Bruce Stevens &amp; Theresa Stevens</b>					
S159.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S160 - Akatarawa Valley Residents - Dr Harold Cuffe</b>					
S160.007	General	General	Oppose	Notes that residents deal with incursion of pest	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	comments	comments - overall		species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S162 - Akatarawa Valley Residents - Phil Kirycuk</b>					
S162.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S163 - Akatarawa Valley Residents - John Simister</b>					
S163.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S164 - Akatarawa Valley Residents - Sarah Purdy</b>					
S164.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S166 - Akatarawa Valley Residents - Dr Anna De Raadt &amp; Roger Fairclough</b>					
S166.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S167 - Akatarawa Valley Residents - Allan and Sarah Kelly</b>					
S167.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	
<b>S168 - Akatarawa Valley Residents - Barry Hearfield &amp; Carol McGhie</b>					
S168.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S170 - Akatarawa Valley Residents - Karina Fraser &amp; Grant Fraser</b>					
S170.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S171 - Akatarawa Valley Residents - Jessica Perno &amp; Gavin Perno</b>					
S171.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S172 - Akatarawa Valley Residents - Thomas Davies</b>					
S172.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous biodiversity.	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.
<b>S174 - Akatarawa Valley Residents - Pam Ritchie</b>					
S174.007	General comments	General comments - overall	Oppose	Notes that residents deal with incursion of pest species onto their land from GWRC land and seeks GWRC manage pests on their own land. Notes that pest species adversely impact socking levels and prevent landowners from increasing indigenous	<del>No decision requested.</del> GWRC to actively manage the pests on GWRC land that borders the Akatarawa Valley and review its practices regarding the management of its land particularly forestry.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				biodiversity.	
<b>S210 - Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.</b>					
S210.001	General comments	General comments - unplanned greenfield development	<b>Amend Oppose</b>	<p>Submitter has concerns as to zoning of their land and considers the zoning as 'unplanned greenfield areas' is contrary to previous the previous stance taken by GWRC and UHCC. The submitter notes they have invested time and money on expert assessments to date to support the rezoning of their land which have demonstrated the suitability of its land for residential and mixed use activities, and the economic and social benefits to the wider community, including affordable housing, recreational opportunities, and ecological enhancement of important areas.</p> <p>Submitter opposes their land being identified 'unplanned greenfield areas' on Planning Map 88 and being subject to the 'unplanned urban development' provisions of PC1, which include prohibited activity rules associated with stormwater discharges. Considers it is appropriate based on the planning history of the land for it to be included in the 'planned/existing urban area' notation on Planning Map 88.</p>	Seeks GWRC reclassify submitters land in Pinehaven/Silverstream (as shown on Map 1 in Appendix A with legal descriptions provided in Appendix B - refer to original submission) from 'unplanned greenfield areas' to 'Planned/existing urban area'.
S210.008	2 Interpretation	Hydrological control	<b>Amend Oppose</b>	Concerned with definition suggesting management of stormwater would be "... in a way that replicates natural processes...". Considers the reference to natural processes is inappropriate, and would seek the definition be amended to refer to 'hydraulic processes'.	The submitters seek the definition of hydrological control to be amended as follows: "The management of a range of stormwater flows and volumes, and the frequency and timing of those flows and volumes, from a site or sites into rivers, lakes, wetlands, springs, riparian margins, and other receiving environments in a way that replicates <del>natural processes</del> <b>hydraulic processes</b> for the purpose of reducing bank erosion, slumping, or scour, to protect freshwater ecosystem health and well-being."
S210.022	8 Whaitua Te Whanganui-a-Tara	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	<b>Amend Oppose</b>	Notes intent of the objective to 'protect' groundwater dependent ecosystems (Clause (b)) and ecosystems in connected surface water bodies (Clause (c)), and 'avoid' aquifer consolidation (Clause (f)). However oppose these approaches as they lead to restrictive and unnecessary restrictions in policies and rules to appropriately implement the objective. Consider an effects management approach as per the NPS-FM is more appropriate and provides a balanced response, and seek an amendment to these clauses to ensure consistency within the objective with Clauses (a), (d)	Seeks the following amendments to Objective WH.O6 (or similar wording): i. Clause (b) be amended to read: " <del>protect</del> <b>ensure that</b> groundwater dependent ecosystems <b>are maintained or improved where degraded</b> " ii. Clause (c) be amended to read: " <del>protect</del> <b>ensure that</b> ecosystems in connected surface water bodies are <b>maintained or improved where degraded</b> , and" iii. Clause (f) be amended to read: "avoid <b>or minimise</b> aquifer consolidation"

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				and (e) and other objectives (such as Objective WH.O9).	
S210.024	8 Whaitua Te Whanganui-a-Tara	Policy WH.P1: Improvement of aquatic ecosystem health.	Amend Oppose	Opposes Policy WH.P1 as it does not accurately reflect intent of the objectives being to maintain the aquatic ecosystem health where TAS are met, and improving them where TAS is not currently met. Considers the objectives provide more flexibility than the 'improve' approach in the policy.	Seeks the following amendments to Policy WH.P1 to better reflect and implement the objectives (or similar wording):  "Improvement of aquatic ecosystem health Aquatic ecosystem health will be <b>maintained or improved where relevant target attribute state is not met</b> by: (a) progressively reducing the load or concentration of contaminants, particularly sediment, nutrients, pathogens and metals, entering water <b>where relevant target attribute state is not met</b> , and (b) <b>maintaining or</b> restoring habitats <b>where relevant target attribute state is not met</b> , and (c) <b>maintaining or</b> enhancing the natural flow regime of rivers and managing water flows and levels, <del>strong</del> <b>where relevant target attribute state is not met</b> , including where there is interaction of flows between surface water and groundwater, and (d) co-ordinating and prioritising work programmes in catchments that require changes to land use activities that impact on water."
S210.025	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend Oppose	<del>Seeks the following amendments to Policy WH.P1 to better reflect and implement the objectives (or similar wording):</del>  <del>"Improvement of aquatic ecosystem health Aquatic ecosystem health will be maintained or improved where relevant target attribute state is not met by: (a) progressively reducing the load or concentration of contaminants, particularly sediment, nutrients, pathogens and metals, entering water where relevant target attribute state is not met, and (b) maintaining or restoring habitats where relevant target attribute state is not met, and (c) maintaining or enhancing the natural flow regime of rivers and managing water flows and levels where relevant target attribute state is not met, including where there is interaction of flows between surface water and groundwater, and (d) co-ordinating and prioritising work programmes in catchments that require changes to land use activities that impact on water."</del>  Considers objectives do not require such a restrictive approach and do not consider the dual process for unplanned greenfield development is warranted as	Amend Clause (a) to read (or similar wording): <del>"Encourage prohibiting unplanned and other greenfield development and for other greenfield developments minimising the to minimise</del> <b>Encourage</b> prohibiting unplanned <b>and other</b> greenfield development <b>and for other greenfield developments minimising the to minimise</b> contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and";  Additional thought be given to clearly identifying level of acceptable targets for these matters that are not cover by the TASs, as identified above in relation to Objective WH.O2  Either delete or amend Clause (f) to read: <del>requiring the active management</del> <b>adopting best practice principles and management</b> of earthworks, forestry, cultivation and vegetation clearance activities; and  Either delete or amend Clause (g) to read: <b>"adopting best practice principles and management of</b> soil conservation treatment, <del>including revegetation with woody vegetation</del> of land with high erosion risk,".

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				<b>there is no dual plan change process in the RMA.</b>	
S210.027	8 Whaitua Te Whanganui-a-Tara	Policy WH.P6: Cumulative adverse effects of point source discharges.	<b>Amend Oppose</b>	Oppose approach in the policy to avoiding the cumulative effects of point source discharges as this policy leads to overly restrictive rules and creates uncertainty for renewal of existing consents as the timeframe referenced in Clause (c)(ii) is not specified. Seeks policy be amended to provide a more flexible effects management approach consistent with objectives and other policies in PC1.	Seeks the following amendments to Policy WH.P6:  Amend the policy to read (or similar wording): "The cumulative adverse effects of point source discharges, excluding stormwater network and wastewater discharges, to water are avoided <b>or minimised</b> and ..."  Clarify the programme for timeframes and programme for the renewal of existing consents in Clauses (b) and (c).
S210.034	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Oppose	Oppose intent of Policy WH.P28 that has direct relevance to their commercial forestry operations, and results in the introduction of prohibited activity Rule WH.R22. As previously discussed in Submission Point #3 of the original submission, the submitter seeks commercial forestry activities to be managed through NES-CF which they consider are appropriate and justified. The submitter also raises the question of the differences in the mapping of erosion risk land in Submission Point #5 of the original submission and the quality of the mapping which is poor and is difficult to tell where the high erosion risk land (plantation (commercial) forestry) areas shown on Map 95 start and finish on the submitter's site due to the pixelation that occurs when zooming in on a particular area.  Oppose Clause (c) that seeks to prohibit new and continuing (after harvesting) of plantation (commercial) forestry on highest erosion risk land (plantation forestry), which leads to prohibited activity Rule WH.R22. The submitters note the intent of Clause (c) is carried through into Schedule 34, as discussed later in this submission. Oppose the use of prohibited activity rules for the reasons given in PART ONE of the original submission. The submitters do not consider the implementation of the PC1 objectives requires or justifies the use of a prohibited activity rule approach and that the provisions of the NES, NPS-CF are more appropriate.	Mapping of 'highest erosion risk land (plantation forestry)' be deleted, or amended and improved to a higher quality so that when zooming in on the map a resource user can easily determine where the areas are located on a site; <del>or</del> Deletion of Clause (c).
S210.040	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new	<b>Amend Oppose</b>	Supports the permitted activity status for stormwater discharges from new and redeveloped impervious surfaces less than 1,000m2, but opposes the exclusion of 'unplanned greenfield development'	Retain Rule WH.R5 be retained as notified, subject to the deletion of the reference to 'unplanned greenfield development' and the following amendment to Clause (a): "the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m2 <b>on an existing lot or future</b>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		and redeveloped impervious surfaces - permitted activity.		included in the rule. Considers reference to unplanned greenfield development unnecessary and inappropriate as the rule is clearly focused on new or redevelopment of existing impervious surfaces, which is reasonable and pragmatic. Concerned that Clause (a) seems to restrict all impervious area to less than 1000m3 for the entire site for all time which is considered onerous and overly limiting. Such an approach does not account for a large site being subdivided into lots, or if the impervious surfaces are historical.	<b>subdivided lot over a 12 month period</b> (baseline property existing impervious area as at 30 October 2023) and..."
S210.041	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	<b>Amend</b> <b>Oppose</b>	While the submitters support the controlled activity status for stormwater discharges from new and redeveloped impervious surfaces greater than 1,000m2 but less than 3,000m2, they oppose the exclusion of 'unplanned greenfield development' included in the rule. Reference to unplanned greenfield development is unnecessary and inappropriate as the rule is clearly focused on new or redevelopment of existing impervious surfaces, which is reasonable and pragmatic. In addition, the submitters are concerned that Clause (a) seems to restrict all impervious area to between 1000m2 and 3,000m2 for the entire site for all time which is considered onerous and overly limiting. Such an approach does not account for a large site being subdivided into lots, or if the impervious surfaces are historical.	Retain Rule WH.R6 as notified, subject to the deletion of the reference to 'unplanned greenfield development' and the following amendment to Clause (a): "the proposal involves the creation of new, or redevelopment of existing impervious areas between 1,000m2 and 3,000m2 <b>on an existing lot or future subdivided lot over a 12 month period</b> (baseline property existing impervious area as at 30 October 2023) and..."
S210.043	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	<b>Amend</b> <b>Oppose</b>	Considers non-complying activity status for all other stormwater discharges that do not comply with the various rules listed is onerous and unnecessary. Considers a discretionary activity status is appropriate for non-compliance with one or more of the various conditions and matters of discretion as the adverse effects of that part of the activity that cannot comply can be identified and assessed, and the application can be declined if the adverse effects are inappropriate and cannot be mitigated. In addition, the submitter opposes the reference to the prohibited activity Rule WH.R13 relating to 'unplanned greenfield development' which they are seeking deletion of. Rule WH.R12 would need to be amended,	Re-categorise WH.R12 to discretionary and delete reference to WH.R13

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				as a consequential change, should GWRC accept the submitters request and delete Rule WH.R13.	
<b>S211 - Hutt City Council</b>					
S211.008	8 Whaitua Te Whanganui-a-Tara	Objective WH.O8: Primary contact sites within Te Awa Kairangi/Hutt River, Pākūratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact.	Support	Considers there are significant challenges in terms of the costs to upgrade the wastewater network to achieve the reduction in E.coli by 2040. Supports the inclusion of 2040 in Objective WH.O8 on the basis that it does not impose the same significant challenges and costs on Council.	Amend Objective WH.O8 as follows: Primary contact sites within Te Awa Kairangi/Hutt River, Pākūratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact by ensuring that by <del>2040</del> <b>2060</b> : (a) Escherichia coli concentrations are at least maintained, or improved where the target attribute states in Table 8.3 are not met, and (b) there is low risk of health effects from exposure to benthic cyanobacteria.
S211.010	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	<p>Concerned with the proposed prohibited activity status for unplanned greenfield development; considers that this precludes consenting pathways for development in unplanned greenfield areas which may have positive outcomes. Concerned that minor activities which extend into unplanned greenfield areas would be prohibited.</p> <p>Considers the s32 evaluation insufficient to justify the proposed prohibited activity status, noting contradictions with regard to the ability of PC1 to mitigate contaminants from urban developments. Further considers that the prohibition on greenfield development is inconsistent with the NPS-UD, particularly Policy 8, and may conflict with the submitter's ability to give effect to the NPS-UD.</p> <p>Notes commentary provided in the s32 report which states that unplanned greenfield development is to be prohibited to enable a future regional plan change alongside a district plan change. Considers that there</p>	<p>Amend Policy WH.P2 as follows:</p> <p>Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by:</p> <p>(a) <del>prohibiting</del><b>avoiding</b> unplanned greenfield development and <del>for managing</del> other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and <del>(b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and</del> (c) imposing hydrological controls on urban development and stormwater discharges to rivers (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation,</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>will be a high economic cost to undertake two simultaneous plan changes, which is not sufficiently assessed in the s32 report.</p> <p>Seeks that this policy direction is amended to "avoid", with a non-complying activity status. Considers that Policy WH.P2(b) is not consistent with and duplicates (c) and (d), noting that the use of "encouraging" in (b) is inconsistent with "imposing" in (c) and "requiring" in (d).</p>	of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater
S211.013	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	Amend	<p>Supports in principle the regulation of stormwater contaminants through hydrological control and WSUD to improve freshwater outcomes. Notes there is overlap with Hutt City District Plan rules which also manage hydrology of stormwater to manage the demand on the three waters network from urban development, which is not addressed in the s32 report.</p> <p>Considers PC1 provisions are light on detail on how hydrological controls and WSUD will be implemented, in comparison with the THW-Three Waters chapter of the Draft Hutt City District Plan which requires hydraulic neutrality measures to assist with managing peak stormwater runoff from development sites so the risk of downstream flooding is not increased, and assist with prolonging the life of existing stormwater management systems. Considers the inclusion of technical specifications in the NRP can assist smaller developments as they could rely on the technical specifications without having to develop bespoke solutions for their site and undertaking expensive hydrological and/or engineering calculations to demonstrate compliance. Supports the recognition of catchment-scale communal schemes.</p>	<p><del>Develop more comprehensive objectives and policies for hydrological control and WSUD measures including acceptable solutions and amend policy--</del></p> <p>Develop a more comprehensive policy and implementation framework with regard to hydrological control and water sensitive urban design measures, including acceptable solutions and amend policy accordingly.</p>
<b>S217 - R P Mansell; A J Mansell &amp; M R Mansell</b>					
S217.001	General comments	General comments - overall	<b>Not Stated Oppose</b>	<p>Considers the use of the prohibited activity status for unplanned greenfield development is inappropriate, as the effects are not specified for any particular area. Considers requiring two plan changes (district and regional) is a misuse of the prohibited activity</p>	<p>Policies associated with unplanned greenfield developments to be amended to provide for the "avoidance <b>or minimising</b>" of adverse effects</p> <p><b>This relates to policies WH.P5 &amp; P.P5, WH.P6 &amp; P.P6, WH.P16 &amp; P.P15.</b></p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				category, which is intended to be used where effects are easily identifiable and discrete. Notes the effects of the prohibited activity are not specified for any particular area, and the extent of the area does not warrant a blanket approach. Considers this proposed approach is onerous, costly and will not achieve implementation of the NPS-UD. Considers the current rules of the NRP and the proposed PC1 rules for planned greenfield development are sufficient to manage the adverse effects of unplanned greenfield development. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	Stormwater discharge activities associated with unplanned greenfield development which have prohibited activity status to either be deleted or have their activity statuses amended.  <b>This relates to policies WH.P2 &amp; P.P2; Rules WH.R13 &amp; P.R12.</b>
S217.003	2 Interpretation	Unplanned greenfield development	<b>Amend</b> <b>Oppose</b>	Concerned development in areas identified as unplanned greenfield development require a plan change process to enable the development. Considers the dual plan change process required under PC1 to change greenfield development from unplanned to planned should not be used as an alternative to the resource consenting process. Concerned the private plan change process will not be effective. Opposes only planned greenfield development being provided for in PC1 and unplanned greenfield development requiring a dual plan change. Considers that the prohibition of activities is contrary to the NPS-UD. Considers insufficient evidence is provided in the s32 report.	All greenfield development to be considered on their merits, and rely on provisions in the NRP and district plan zoning/provisions to manage adverse effects of greenfield development.  Delete all provisions referencing "unplanned greenfield development". Delete definition for "unplanned greenfield development"
S217.004	8 Whaitua Te Whanganui-a-Tara	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	<b>Amend</b> <b>Oppose</b>	Notes Objectives WH.O6 and P.O5 intend to 'protect' groundwater dependent ecosystems and ecosystems in connected surface water bodies, and 'avoid' aquifer consolidation (Objective WH.O6). Opposes these approaches as they lead to restrictive and unnecessary restrictions in policies and rules to appropriately implement the objective. Considers an effects management approach is more appropriate and provides a balanced response.	[...] (b) <del>protect</del> <b>ensure that</b> groundwater dependent ecosystems <b>are maintained or improved where degraded</b> (c) <del>protect</del> <b>ensure that</b> ecosystems in connected surface water bodies <b>are maintained or improved where degraded</b> , and [...] (f) avoid <b>or minimise</b> aquifer consolidation [...]
S217.006	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	<b>Amend</b> <b>Oppose</b>	Considers the proposed shut down period for winter earthworks is onerous and unnecessary in light of the other provisions.	Delete winter shut down requirements.  Retain existing effects management approach for sediment discharges from earthworks.
S217.007	8 Whaitua	Rule	Amend	Generally supports the proposed activity status;	Retain permitted activity status.

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	Te Whanganui-a-Tara	WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.		however considers the exclusion of "unplanned greenfield development" unnecessary and inappropriate, as the rule is already focussed on new or redevelopment of existing impervious surfaces. Considers that the proposed impervious area limit is too restrictive and does not account for subdivision of large properties into smaller lots, or where impervious surfaces are historical.	Amend clause (a) as follows: (a) the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m <sup>2</sup> <b>on an existing lot or future subdivided lot over a 12 month period</b> (baseline property existing impervious area as at 30 October 2023) and...  <b>Delete 'unplanned greenfield development' from rule WH.R5</b>
S217.008	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Not Stated	Supports the proposed activity status; considers the proposed impervious area limit is too restrictive and does not account for subdivision of large properties into smaller lots, or where impervious surfaces are historical.	Retain controlled activity status.  Amend clause (a) as follows: (a) the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m <sup>2</sup> <b>on an existing lot or future subdivided lot over a 12 month period</b> (baseline property existing impervious area as at 30 October 2023) and...  <b>Delete 'unplanned greenfield development' from rule WH.R6</b>
S217.011	8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	<b>Amend Oppose</b>	Considers the use of the prohibited activity status for unplanned greenfield development is inappropriate, as the effects are not specified for any particular area. Considers this proposed approach is onerous, costly and will not achieve implementation of the NPS-UD. Considers that the current rules of the NRP and the proposed PC1 rules for planned greenfield development are sufficient to manage the adverse effects of unplanned greenfield development. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	Delete prohibited activity status for stormwater discharges from unplanned greenfield development.  <b>Delete 'unplanned greenfield development' from rule WH.13</b>
S217.012	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	<b>Amend Oppose</b>	Considers the proposed shut down period for winter earthworks is onerous and unnecessary in light of the other provisions.	Retain existing effects management approach for sediment discharges from earthworks.  Delete winter shut down requirements.
S217.014	9 Te Awarua-o-Porirua Whaitua	Objective P.O5: Groundwater flows and levels, and water	<b>Not Stated Oppose</b>	Concerned the "protect" approach will lead to unnecessarily restrictive policies and rules. Considers that an effects management approach is more appropriate.	Groundwater flows and levels, and water quality, are maintained at levels that <del>protect</del> <b>ensure that:</b> (a) groundwater dependent ecosystems <b>are maintained or improved where degraded</b> , and (b) the values of connected surface water bodies in places where groundwater flows to surface water <b>are maintained or improved where degraded.</b>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		quality, are maintained.			
S217.016	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	Supports the proposed activity status; however considers the exclusion of "unplanned greenfield development" unnecessary and inappropriate, as the rule is already focussed on new or redevelopment of existing impervious surfaces. Considers that the proposed impervious area limit is too restrictive and does not account for subdivision of large properties into smaller lots, or where impervious surfaces are historical.	Retain permitted activity status.  Amend clause (a) as follows: (a) the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m2 <b>on an existing lot or future subdivided lot over a 12 month period</b> (baseline property existing impervious area as at 30 October 2023) and...  <b>Delete 'unplanned greenfield development' from rule P.R5</b>
S217.017	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Amend	Supports the proposed activity status; considers that the proposed impervious area limit is too restrictive and does not account for subdivision of large properties, into smaller lots or where impervious surfaces are historical.	Retain controlled activity status.  Amend clause (a) as follows: (a) the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m2 <b>on an existing lot or future subdivided lot over a 12 month period</b> (baseline property existing impervious area as at 30 October 2023) and...  <b>Delete 'unplanned greenfield development' from rule P.R6</b>
S217.020	9 Te Awarua-o-Porirua Whaitua	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	<b>Amend Oppose</b>	Considers the use of the prohibited activity status for unplanned greenfield development is inappropriate, as the effects are not specified for any particular area. Considers this proposed approach is onerous, costly and will not achieve implementation of the NPS-UD. Considers that the current rules of the NRP and the proposed PC1 rules for planned greenfield development are sufficient to manage the adverse effects of unplanned greenfield development. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	Delete prohibited activity status for stormwater discharges from unplanned greenfield development.  <b>Delete 'unplanned greenfield development' from rule P.R12.</b>
S217.021	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	<b>Amend Oppose</b>	Considers the proposed shut down period for winter earthworks is onerous and unnecessary in light of the other provisions.	Retain existing effects management approach for sediment discharges from earthworks.  Delete winter shut down requirements.
S217.023	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	<b>Amend Oppose</b>	Considers the proposed shut down period for winter earthworks is onerous and unnecessary in light of the other provisions.	Delete winter shut down requirements.  Retain existing effects management approach for sediment discharges from earthworks.

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S217.028	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend Oppose	Considers that the use of the prohibited activity status for unplanned greenfield development is inappropriate, as the effects are not specified for any particular area. Considers this proposed approach is onerous, costly and will not achieve implementation of the NPS-UD. Considers that the current rules of the NRP and the proposed PC1 rules for planned greenfield development are sufficient to manage the adverse effects of unplanned greenfield development. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	<del>Delete policy</del> —Delete reference to prohibiting 'unplanned greenfield development' within Policy (i.e. delete clause (a)).  Delete or recategorize the prohibited activity status for stormwater discharge activities associated with 'unplanned greenfield development'
S217.029	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Amend Oppose	Considers the use of the prohibited activity status for unplanned greenfield development is inappropriate, as the effects are not specified for any particular area. Considers this proposed approach is onerous, costly and will not achieve implementation of the NPS-UD. Considers that the current rules of the NRP and the proposed PC1 rules for planned greenfield development are sufficient to manage the adverse effects of unplanned greenfield development. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	Delete policy-
S217.030	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend Oppose	Considers the use of the prohibited activity status for unplanned greenfield development is inappropriate, as the effects are not specified for any particular area. Considers this proposed approach is onerous, costly and will not achieve implementation of the NPS-UD. Considers that the current rules of the NRP and the proposed PC1 rules for planned greenfield development are sufficient to manage the adverse effects of unplanned greenfield development. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	<del>Delete policy</del> —Delete reference to prohibiting 'unplanned greenfield development' within Policy (i.e. delete clause (a)).  Delete or recategorize the prohibited activity status for stormwater discharge activities associated with 'unplanned greenfield development'
S217.031	9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned	Amend Oppose	Considers the use of the prohibited activity status for unplanned greenfield development is inappropriate, as the effects are not specified for any particular area. Considers this proposed approach is onerous, costly and will not achieve implementation of the NPS-UD. Considers that the current rules of the NRP and the	Delete policy-

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		greenfield development.		proposed PC1 rules for planned greenfield development are sufficient to manage the adverse effects of unplanned greenfield development. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	
S217.032	9 Te Awarua-o-Porirua Whaitua	P.P5: Localised adverse effects of point source discharges.	Oppose	Considers the use of the prohibited activity status for unplanned greenfield development is inappropriate, as the effects are not specified for any particular area. Considers requiring two plan changes (district and regional) is a misuse of the prohibited activity category, which is intended to be used where effects are easily identifiable and discrete. Notes the effects of the prohibited activity are not specified for any particular area, and the extent of the area does not warrant a blanket approach. Considers this proposed approach is onerous, costly and will not achieve implementation of the NPS-UD. Considers the current rules of the NRP and the proposed PC1 rules for planned greenfield development are sufficient to manage the adverse effects of unplanned greenfield development. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	Delete reference to 'unplanned greenfield development' within Policy.  Policies associated with unplanned greenfield developments to be amended to provide for the "avoidance <b>or minimising</b> " of adverse effects
S217.033	9 Te Awarua-o-Porirua Whaitua	P.P6: Point source discharges	Oppose	Considers the use of the prohibited activity status for unplanned greenfield development is inappropriate, as the effects are not specified for any particular area. Considers requiring two plan changes (district and regional) is a misuse of the prohibited activity category, which is intended to be used where effects are easily identifiable and discrete. Notes the effects of the prohibited activity are not specified for any particular area, and the extent of the area does not warrant a blanket approach. Considers this proposed approach is onerous, costly and will not achieve implementation of the NPS-UD. Considers the current rules of the NRP and the proposed PC1 rules for planned greenfield development are sufficient to manage the adverse effects of unplanned greenfield development. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	Delete reference to 'unplanned greenfield development' within Policy.  Policies associated with unplanned greenfield developments to be amended to provide for the "avoidance <b>or minimising</b> " of adverse effects

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S217.034	9 Te Awarua-o-Porirua Whaitua	P.R1: Point source discharges of specific contaminants – prohibited activity.	Oppose	Considers the use of the prohibited activity status for unplanned greenfield development is inappropriate, as the effects are not specified for any particular area. Considers requiring two plan changes (district and regional) is a misuse of the prohibited activity category, which is intended to be used where effects are easily identifiable and discrete. Notes the effects of the prohibited activity are not specified for any particular area, and the extent of the area does not warrant a blanket approach. Considers this proposed approach is onerous, costly and will not achieve implementation of the NPS-UD. Considers the current rules of the NRP and the proposed PC1 rules for planned greenfield development are sufficient to manage the adverse effects of unplanned greenfield development. Seeks for provisions which avoid or prohibit activities associated with unplanned greenfield development to be deleted.	Not stated.
<b>S260 - Cannon Point Development Limited (Ltd.)</b>					
S260.001	General comments	General comments - overall	Support	Supports PC1 objectives but considers the objectives do not warrant the subsequent policies and rules that prohibit unplanned greenfield development and associated stormwater discharges. Concerned this prohibition would foreclose any opportunity to manage adverse effects to achieve Target Attribute States and coastal water objectives where this is possible. Suggests an effects management approach would better allow for the competing directives of the NPS-FW and NPS-UD to be resolved.	<del>Not stated.</del> Delete the definition of Unplanned greenfield development and delete Maps 86-89 Greenfield Areas (planned and unplanned). Or alternatively amend Map 88 to include the site extent of Cannon Point, as shown on the map included in Appendix A, and further described in paragraph 1.12, of submission as a Planned/ existing urban area, and make consequential amendments to subsequent PC1 provisions, to reflect the above.
S260.002	General comments	General comments - unplanned greenfield development	Oppose	Opposes the identification of unplanned greenfield areas in PC1 maps and the unplanned greenfield development definition. Considers this development activity should be controlled by the relevant zone rules in the District Plan.  Concerned the inclusion of the Rural Lifestyle zone as Unplanned Greenfield Area under PC1 is inconsistent with the inclusion of other similar zones as planned development across other local authorities, in particular Large Lot Residential in Wellington City	<del>Not stated.</del> Delete the definition of Unplanned greenfield development and delete Maps 86-89 Greenfield Areas (planned and unplanned). Or alternatively amend Map 88 to include the site extent of Cannon Point, as shown on the map included in Appendix A, and further described in paragraph 1.12, of submission as a Planned/ existing urban area, and make consequential amendments to subsequent PC1 provisions, to reflect the above.

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				<p>Council and Hill Residential in Hut City Council. Considers residential development in this zone is considered to be planned development and should be defined as such in PC1. Considers the approach is fundamentally flawed from a resource management perspective, and contrary to the Upper Hut District Plan.</p> <p>Considers defining unplanned greenfield areas as those that do not have an urban or future urban zone as of 30th October 2023 is inflexible and unreasonable because the date does not allow for notified plan changes which are already processing that propose to re-zone land for residential use beyond that date. Notes in the recommendations to the Joint Committee Subcommittee for the draft Wairarapa-Wellington-Horowhenua Future Development Strategy (FDS), GW support the submitters site as a growth area. Considers the definition and approach to what is unplanned urban development is flawed and needs to be reconsidered consistently across each district council.</p>	
S260.003	2 Interpretation	Unplanned greenfield development	Oppose	<p>Considers the unplanned greenfield areas identified in PC1 maps and the consequential definition is not justified in PC1 . Considers this development activity should be controlled by the relevant zone rules in the District Plan. Considers the inclusion of the Rural Lifestyle zone <b>under the Upper Hutt District Plan</b>, as Unplanned Greenfield Area under PC1 is inconsistent with the inclusion of other similar zones as planned development across other local authorities, in particular; Large Lot Residential in Wellington City Council and Hill Residential in Hut City Council. Notes the Rural Lifestyle Zone provides for detached houses on lots larger than those in the residential zones subject to conditions and therefore considers residential development in this zone is considered to be planned development and should be provided for as such in PC1.</p> <p>Considers defining unplanned greenfield areas as those that do not have an urban or future urban zone</p>	Delete the definition of Unplanned greenfield development and delete Maps 86-89 Greenfield Areas (planned and unplanned). Or alternatively amend Map 88 to include the site extent of Cannon Point, as shown on the map included in Appendix A, <b>and further described in paragraph 1.12</b> , of submission as a Planned/ existing urban area, and make consequential amendments to subsequent PC1 provisions, to reflect the above.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				as of 30th October 2023 is inflexible and unreasonable because the date does not allow for notified plan changes which are already processing that propose to re-zone land for residential use beyond that date. Notes in the recommendations to the Joint Committee Subcommittee for the draft Wairarapa-Wellington-Horowhenua Future Development Strategy (FDS), GW support the submitters site as a growth area.	
S260.013	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity.	Amend	Notes the clearance of vegetation on Highest Erosion Risk Land (woody vegetation) that is a total area of 200m2 or less in any consecutive 12-month period, and any associated discharge of sediment to a water where this is not to implement the erosion risk treatment plan or for the control of pest plants is not provided for as a permitted or controlled activity. Therefore, it is a discretionary activity under Rule WH.R19. Considers it is unclear whether it is council's intention for vegetation clearance of 200m2 or less, in this erosion risk overlay, to be a discretionary activity. Assumes this to be a drafting error, . Considers the discretionary activity as it stands is onerous and unnecessary. Considers where there are large properties and track maintenance is required to clear woody vegetation, a permitted activity standard of 200m2 per property is too small. Considers clearance of 2000m2 per property as a minimum or provision for clearing of vegetation for track maintenance should be considered.	Amend Rule as follows:  Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a surface water body is a permitted activity provided the following conditions are met: <b>(a) the vegetation clearance is a total of 200m2 or less per property in any consecutive 12-month period, or <del>(a)</del>(b) the vegetation clearance is:(i) to undertake track maintenance, or <del>(ii)</del>(ii) to implement an action in the erosion risk treatment plan for the farm, or<del>(iii)</del> (iii) for the control of pest plants, and <del>(c)</del> (c) debris from the vegetation clearance is not placed where it can enter a surface water body.</b>
S260.015	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance - discretionary activity.	<del>Amend</del> Support	Supported if Rules WH.R17 and WH.R18 are amended as sought.	<del>Not stated.</del> —Amend Rule WH.R17 and WH.R18 as sought.
S260.018	13 Maps	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Oppose	Considers the necessity for having unplanned greenfield areas identified on the proposed PC1 maps (and the consequential definition of unplanned greenfield development) is not adequately justified in PC1 or the accompanying S.32 Report. Considers in relation to the Cannon Point site, Map 88 does not accommodate planned residential development where	(a) Delete Maps 86-89 Greenfield Areas (planned and unplanned) OR if relief is not accepted then (b) Amend Map 88 to include the site extent of Cannon Point as a planned/existing urban area <b>as shown on the map</b> included in Appendix A, <b>and further described in paragraph 1.12</b> of the submission.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				this is provided for in the Rural Lifestyle Zone of the Upper Hut District Plan, nor where it is proposed through re-zoning subject to existing notified plan changes PC50 and the IPI for Upper Hutt. Considers map 88 does not reflect the GWRC officer recommendation that the item should be included as planned development in Upper Hut in the FDS. Considers the definition and approach to what is unplanned urban development is flawed and needs to be reconsidered consistently across each district council.	
<b>S288 – China Forest Group Company New Zealand Ltd</b>					
S288.001	General comments	General comments - overall	Not Stated	<p>"Considers several aspects of PC1 are poorly founded and require considerable research and explanation. Notes the following points of concern:</p> <ul style="list-style-type: none"> <li>- the consultation/representation process is flawed and short-changed, directly impacting sectors.</li> <li>- controls extend beyond the recommendations of whaitua committee reports.</li> <li>- rules that apply to forestry that are not supported by GWRC data and past records.</li> <li>- the rules are unable to be implemented without loss of estate due to the spatial logistics of harvesting and roading.</li> <li>- there has been no consideration of the ETA and other cost liabilities contingent upon non-replant of land retired from PC1 rules.</li> <li>- duties under the NES Regulation 6 Stringency insufficiently executed.</li> <li>- the s32 analysis is inadequate. "</li> </ul>	<p>Remove the sections of PC1 related to forestry.</p> <p>Align rules to those of the NES-CF.</p> <p>Work collaboratively with industry participants and land-owners to implement good practice, and where needed, engage on how to refine and plan land management outcomes that will fulfil the objectives without excessive bureaucracy and cost.</p>
S288.002	General comments	General comments - consultation	Not Stated	"Acknowledges the necessity of PC1 to respond to the requirements of the NPS-FW, and acknowledges the purpose of the whaitua committees to resolve issues before plans or rules were made. However, notes there was only one identifiable party with forestry expertise in Te Awarua-o-Porirua Whaitua until 2018, and no such expertise within Te Whaitua te Whanganui-a-Tara. Concerned further engagement with affected sectors was not undertaken between completion of action plans and publishing of PC1, noting a divergence between PC1 rules to achieve	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>freshwater objectives and the whitua committees' recommendations. Notes replanting on nominated high risk land is not included as a non-complying use, but is intended to be rectified by way of submissions by GWRC. Considers it inappropriate to insert rules that have not been included in public documentation. Considers it is bad faith to notify significant changes from the NRP with limited time to make submissions.</p> <p>Considers forestry, and sectors that may potentially be significantly adversely affected, have been under-represented in development of the PC1 outcomes. Considers direct engagement with the sector should have been undertaken to understand the implications and practicality of the rules. No concerns raised by the submitter with the recommendations of the whitua committees, noting the expectations of those recommendations that the sector and GWRC would work within the existing framework to achieve water quality objectives. Considers the outcomes are materially different, and notes the timeframe for the submission process limited for the required research and engagement needed. Concerned submissions are used to rectify oversights not included in PC1. "</p>	
S288.003	General comments	General comments - plantation forestry	Not Stated	<p>Notes major disparities between the whitua committee recommendations and PC1 rules. Notes the TAP committee considered more stringent rules for forestry to achieve the sediment objectives, but concluded the permitted framework of NESPF should be given time to be implemented, and that understanding and mapping erosion prone land at the local whitua scale was important to inform future planning. Notes that no recommendations were made by the TAP that plantation forests should be retired, nor the need identified for stringency beyond the (then) NES-PF. Notes that while recognising potential water quality risks from forestry, neither whitua committee recommended an explicit need to retire areas of production forestry. Notes neither whitua committee considered a need for major strengthening of the regulatory regime, but rather recognised the (then) NES-PF and urged a focus on education,</p>	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				implementation, monitoring and enforcement where necessary. Notes the whitua recommendations sought close liaison between the sector and GWRC land management staff when looking at land use management planning around high-risk erosion sites. Notes neither whitua committee made recommendations to address an explicit link between forestry and water quality attribute standards or objectives.	
S288.004	General comments	General comments - plantation forestry	Not Stated	"References data from monitoring sites and an ecological assessment which indicate very small proportions of the Pouewe Catchment-Horokiri have been exposed to potentially elevated levels of sedimentation above baseline from forestry activity, and that there is at least reasonable water quality. Considers it unlikely that forestry has led to the poor state of the Horokiri for the following reasons: - timing and scale of forestry activity - the small percentage of the catchment under harvest over the prior 20 years - large proportions of the catchment under closed canopy forest at any one time - the large percentage of the catchment under livestock management - immediate proximity of major highways and highway construction. "	Not stated
S288.005	General comments	General comments - plantation forestry	Not Stated	Cites aerial sequences and monitoring data which suggest the effects of harvesting have not been as significant as assumed, given harvesting and earthworks have been in train for an extended period until the latest published monitoring, and given assumed effects are expected to be cumulative downstream. Notes a survey which ranked the catchment as "average" and likely representative of fish diversity. Notes almost all harvesting and earthworks undertaken in the contributory forest was undertaken prior to the NES-PF/CF.	Not stated
S288.006	General comments	General comments - plantation forestry	Not Stated	Cites aerial sequences and monitoring data which suggest the effects of harvesting and earthworks have not been as significant as assumed, given harvesting and earthworks have been in train for an extended period until the latest published monitoring, and given	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				assumed effects are expected to be cumulative downstream.	
S288.007	General comments	General comments - plantation forestry	Not Stated	Cites aerial sequences and monitoring data which suggest factors other than harvesting are influencing lowered attribute states in the Te Awa Kairangi forested mainstems-Pakaratahi.r catchment, given there is no harvesting activity and there is a dominance of closed canopy vegetation within the catchment.	Not stated
S288.008	General comments	General comments - plantation forestry	Not Stated	"Cites aerial sequences and monitoring data which suggest it is unlikely that plantation forest activities are a major factor in poor clarity and MCI attribute states within the Te Awa Kairangi rural streams-Mangaroa catchment, given there are low suspended sediments and the low proportion of the total catchment subject to recent or long-term harvesting and earthworks. Considers the long length of the main stem of the catchment proceeding through pastoral and agricultural land use is a more likely explanation. Notes the tributaries that are under pine forest were modelled at a higher status than the main stem and while this may reflect the harvesting status at the time the modelling was done, it also reflects the established science that over a long time series, plantation forests will generate better water quality than current pastoral use.  Notes an ecological report which detected the presence of fish, indicating that water quality in the small plantation tributaries are likely better than the main stem of the Mangaroa."	Not stated
S288.009	General comments	General comments - plantation forestry	Not Stated	"Recognises that forest harvesting and earthworks can locally and temporarily raise sediment levels during and immediately after operations. However, considers over the long-term, impacts on waterbodies are low and often trend towards baselines established for native forest areas. Notes forestry activities have been undertaken in preceding years in catchments displaying good water quality results. Notes harvesting occupies relatively small proportions of the total catchments for extended timeframes, and have not resulted in NoF attribute values declining below	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>objectives. Further notes that due to the spatial layout of surrounds, expansion of plantations, other than onto farmland, is not possible.</p> <p>Notes council monitoring results in other catchments, particularly Horokiwi and Mangaroa, are relatively poor and while harvesting in portions of these catchments has been undertaken in recent years the proportions of the total catchment areas subject to harvest are low. Notes the waterbodies in these catchments pass through large proportions of pastoral agricultural land and in the case of the Horokiwi and its main tributary, remain close to long reaches of heavily used highway and the earthworks associated with the recently completed Transmission Gully SH1. Considers it is highly likely given the current status of the streams, that a focus on the other land uses will generate the standards required notwithstanding that updated and upgraded attention to sediment controls in forestry earthworks is a legitimate expectation.</p> <p>Considers the temporal effects of forestry in relation to land use contaminant effects have not been recognised.</p> <p>Considers while all land use creates contaminant effects, a short term increase in adverse effects that then return to levels similar to natural baseline especially if assisted by other land use good practice, is very different to an adverse effect (even when mitigated by good practice) arising every day from a land use such as farming or urban use. By definition that becomes a permanent 'pressure' change to the environment. "</p>	
S288.010	General comments	General comments - plantation forestry	Not Stated	"Considers GWRC's assessments of the efficacy of the regulatory framework is based on standards that predate the current regime, noting forestry activity in some catchments has been ongoing since before the NES-PF and NES-CF. This includes first rotation planting that had no regulated riparian setbacks from streams or regulation related to harvesting around or over streams nor discharge permits.	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>Notes neither whaitua committee recommended the introduction of stringent new rules, and instead advocated that the NES-PF is given time to adjust and bed in backed up by, education, monitoring and where and if necessary, enforcement. Notes existing operations with constructive interactions between monitoring staff and forest management, including testing alternatives to achieve the best results possible.</p> <p>Notes most forestry companies review their plantable boundaries after harvest and as a result, most second rotation estates see increased non-productive reserve, retirements, and riparian areas, and in many cases riparian buffers are much larger than the minimum. Considers past retirements and riparian exclusions from previous operations reflect the sentiment of the whaitua committees in respect of promoting good land use and land use decision making, education, and working with Council land managers to achieve good outcomes. Concerned that this existing work has not been recognised."</p>	
S288.011	General comments	General comments - plantation forestry	Not Stated	<p>Considers there is no argument that earthworks at the time of harvest is the largest manageable contributor to sediment yield in forestry. These concerns were recognised in regulations of the NES-PF and NES-CF to target sediment generation, similar to the requirements of farm plans. Notes the requirement for erosion and sediment controls plans in Policy WH.P28(b), Rule WH.R20(b) and Schedule 34, which reference forest practice guides, which have had limited time to bed in. Notes that based on GWRC data, the state of stream water quality reflected the cumulative effects of activities predating the NES-PF. Considers the discharge standard of 100g/m3 does not relate to a particular stream attribute, topography, geology or soils of the whaitua. Considers the standard is a uniform standard irrespective of activity or location/circumstance and appears to be principally designed around the use of point source discharges to water from large sediment capture and concentration</p>	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>ponds with fixed infrastructure or without flocculation, which cannot often be utilised in a forestry context. Considers the standard difficult to implement, does not deliver real-time feedback, and has no temporal component. Notes main methods for managing forestry earthworks as set out in forestry practice guides, and that discharges are largely diffuse. Considers the requirements for farm plans a corollary. Considers the visual clarity standard is more relevant to rural land use. Nevertheless, considers here is a perversity in the requirement for a lower decline in visual clarity in class 1 and schedule F1 rivers, as those rivers often come from areas inclusive of plantation forestry. Considers allowing higher clarity loss in lower quality rivers acknowledges continuation of higher levels of contaminants. Considers this area needs reconsideration and there should be an approach focused on education, training and where necessary enforcement, as recommended by the whaitua committees, rather than new rules and variants of the NES-CF.</p>	
S288.012	General comments	General comments - plantation forestry	Not Stated	<p>Considers there is little cognisance in PC1 of the spatial and temporal patterns of harvesting, and the influence this may or may not have on the attribute states of relevant catchments. Considers NPS-FW obligations have been relied on to avoid delaying actions notwithstanding incomplete information. Notes that from the data available, NoF targets were being met in catchments that are largely forested and where harvesting took place and are expected to continue to do so. Considers GWRC has overlooked that in catchments with a relatively small proportion of plantation, and where their reaches aligned with pastoral and urban infrastructure, there were poorer attribute results. Notes this conforms with NZ-wide trends that water quality attributes decline in order from undisturbed native forest, exotic forest, pastoral land use and urban. Considers GWRC has assumed that regulations for earthworks and harvesting under the NES-PF have no efficacy toward achieving the goals of the NPS-FW, but at the time of the published data being collected, the NES-PF was new and most</p>	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>of the harvesting that may have contributed to adverse freshwater outcomes had been undertaken in the prior decade. Considers GWRC have not considered that as forests progressed through their first to second rotations, normal practice and NES regulatory requirements saw provision of increased setbacks and retirement and reservation of problematic harvest areas. Concerned that while not all desired data was available, and an absence of such data was not a reason to avoid mitigatory actions, data that was available did not trigger a need or urgency for the whaitua committees to recommend significant and stringent changes to the regulatory framework surrounding forestry.</p>	
S288.013	General comments	General comments - plantation forestry	Not Stated	<p>Concerned with the approach taken to define areas of "high erosion risk" and the application of those findings. Considers it impractical and will result in write-off of much larger areas than estimated by GWRC. Notes that predictions from cutover are likely to significantly overestimated yield in the universal erosion model. Notes research that confirms sediment contributions from poorly controlled earthworks outweigh those from the cutover.</p> <p>Concerned about the use of a lidar surface to inform the mapping of highly erosion prone areas, as lidar surface does not represent the underlying bedrock surface.</p>	Not stated
S288.014	General comments	General comments - plantation forestry	Not Stated	<p>Considers the erosion susceptibility layers are based on information that excludes geological considerations and has not been peer reviewed.</p> <p>Considers the 5m2 resolution of the underlying lidar and the method applied will invariably be wrong, and a poor predictor of stability in the field, leading to areas being retired that were not at risk of slipping, as well as areas not being retired that may suffer landsliding in severe weather events.</p> <p>Considers the methodology for "Highest Erosion Risk - Plantation" has led to 'pixilation', which is impractical for forestry activities as rules could enable forestry in one patch and disallow it in an adjacent patch.</p>	Not stated

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				Notes several factors which determine harvesting feasibility, resulting in more land needing to be retired than suggested in GWRC data. Estimates that in the estate GFG manages, anything from an average of 9% up to 18% might be retired due to PC1 rules. Notes recommendations from whitua committees that could be applied to forestry, including developing site and property level plans with landowners, and funding and support for sediment mitigation activities.	
S288.015	General comments	General comments - plantation forestry	Not Stated	Considers the total area of compulsory retirement could be substantially greater than assessed by GWRC. Concerned there is the potential for the total write-off of plantation sites, and that this should have been assessed in the s32 analysis.	Not stated
S288.016	General comments	General comments - plantation forestry	Not Stated	Notes the rates relief set out in Method M44 are likely to be miniscule to zero, given the land will have no commercial value upon implementation of PC1. Considers advice should be free given the public interest being served. Concerned there is no meaningful certainty or long-term commitment, given the short-term nature of local body priorities.	Not stated
S288.017	General comments	General comments - plantation forestry	Not Stated	Considers the obligations under the ETS have not been given consideration. Questions why a forest owner should pay for restocking an area for the benefit of the wider public, to avoid liabilities from a rule created in the wider public interest. Questions who will bear the cost and the liability of ongoing management of native forest reforestation and the risk and cost of a ETS compliant forest where reversion is the chosen route. Concerned non-harvest may be the best option for forest owners due to the cost of PC1 and lack of future economic land use options, and questions who will compensate for stranded assets or potential liabilities if there is synchronous collapse. Considers proposed compensation and assistance methods are practically worthless.	Not stated
S288.018	General comments	General comments - current legislation	Not Stated	Concerned about the reliance on Regulation 6 of the NES-PF (now NES-CF) to enable rules which require consenting for forestry activities and abandonment of a portion of productive estate without demonstrating the need for this stringency in PC1.	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>Considers GWRC's water quality data is insufficient and does not support the stringency upon forestry it seeks to apply. With respect to forestry activities, considers there is insufficient evidence to support the objectives and attribute limits sought. Notes some monitoring sites are already meeting attribute targets, and where not, the relative role of forestry activity is small.</p> <p>Considers drivers for poor quality likely arise from the extended proximity of reaches to agricultural activity, major highways and urban and semi-rural development.</p> <p>Notes it is unclear how an "equitable" share based on area aligns with an effects-based response to partitioning sediment budget against land uses.</p> <p>Considers the proposed rules are unjustified due to well-established knowledge that production forests are likely to produce more sediment during harvest than pastoral agriculture on the same landform but return to near natural baselines shortly thereafter; and nationwide consistency of trends across land use of declining water quality across most attributes from native forest, exotic forest, pastoral agriculture, cropping and urban.</p> <p>Considers increased sediment yield relative to pastoral land use is offset by decades of below average yield, and that effects are a permanent day-to-day feature on pastoral sites.</p> <p>Concerned a justifiable, quantifiable link between the action and the water quality response has not been provided for blanket rules to retire an allocated portion of private forestry land use. Considers that at the time of the deliberations of the whitua committees, any effects on water in the whitua that could have been attributed to forestry activity were a cumulative summation of previous years of activity predating the NES-PF/CF. Disagrees that the NES-PF/CF allows</p>	

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

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	ion				
S288.023	2 Interpretation	Erosion and sediment management plan	Amend	Considers separate schedules creates confusion, noting there is overlap between existing NES-CF requirements and PC1.	Work to NES-CF schedule 4 & 5. Avoid cross-over and overlap with existing processes developed under the NES-CF.
S288.024	2 Interpretation	Harvesting	Amend	Considers there is misalignment with the NES-CF.	Amend to: has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Commercial Forestry Regulations 2023).
S288.025	2 Interpretation	Highest erosion risk land (plantation forestry)	Oppose	Considers the map process inappropriate for purpose and unjustified.	Delete. Consult properly and work with industry.
S288.025	2 Interpretation	Highest erosion risk land (woody vegetation)	Oppose	Considers the map process inappropriate for purpose and unjustified.	Delete. Consult properly and work with industry.
S288.026	2 Interpretation	Mechanical land preparation	Amend	Considers there is misalignment with the NES-CF.	Amend to: has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Commercial Forestry Regulations 2023).
S288.027	2 Interpretation	Registered forestry adviser	Amend	Notes registered members of the NZ Institute of Forestry are automatically also Registered Forestry Advisors.	Add sub-clause (d): <b>and includes a Registered Member of the New Zealand Institute of Forestry.</b>
S288.029	2 Interpretation	Replanting	Amend	Considers there is misalignment with the NES-CF.	Amend to: has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Commercial Forestry Regulations 2023).
S288.030	2 Interpretation	Stabilisation	Amend	Notes other methods are not included. Concerned PC1 proposes Schedule 34 ESC, that references methods from forest practices guides, but these are missed from the definition, which only includes GWRC ESC guideline 2021.	Clarify relationship between earthworks and forestry earthworks.
S288.031	2 Interpretation	Vegetation clearance (for the purposes of Rules WH.R20,	Amend	Considers there is misalignment with the NES-CF.	Amend to: has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Commercial Forestry Regulations 2023).

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		WH.R21 and P.R19, P.R20)			
S288.032	5.4 Beds of lakes and rivers	Rule R128: New structures - permitted activity.	Amend	Considers there is misalignment with the NES-CF.	Amend to: has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Commercial Forestry Regulations 2023).
S288.033	6 Other methods	Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	Notes threatened freshwater species exist within and utilise habitat provided by plantations.	Require action plans for species to include partnership with landowners/ forest owners within whose areas such species occupy habitat or are dependent upon the ecosystem services supporting the habitat.
S288.034	6 Other methods	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	Supports objective, however notes the need to include working with landowners.	Require prioritisation to include consultation with landowners where action identified as required.
S288.035	6 Other methods	Method M41: Identifying and responding to degradation	Amend	Considers the text, purpose and execution unclear. Supports publishing of trends provided monitoring is sufficient. Considers the identification of the trend of degradation as "not being natural" is mis-scoped. Considers the purpose should be identification of trend(s) related to TAS that are negatively divergent from the Whaitua action plans. Considers prior to	Review and rewrite.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		in freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.		introducing a plan change, any response should involve reviewing the plan TAS for applicability, reliability of data, the degree to which current regulation has spurred changes in practices, and any other influences on efficacy.	
S288.036	6 Other methods	Method M43: Supporting the health of urban waterbodies .	Support	Notes national trend of water in urban environments as consistently the poorest and considers it is essential this is addressed.	Not stated
S288.037	6 Other methods	Method M44: Supporting the health of rural waterbodies .	Amend	Considers this reflects the recommendations of whaitua committees.	Amend to include: <b>deliver a specific programme of engagement with forestry practitioners</b>
S288.038	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.	Amend	Seeks clarification on "waiora state", noting natural character is not a condition fixed in time. Considers the description needs to include the caveat that natural character refers to a waterbody's state in response to input conditions that are managed to achieve a level of naturalness. Notes climate change may mean natural character is not the same as current targets, which risks a mismatch between what is legally enforced and what is achievable.	Include the caveat that natural character refers to a waterbodies state in response to a variety of input conditions that are managed to achieve a level of naturalness.
S288.039	8 Whaitua Te Whangan	Objective WH.O2: The health and	Support	Not stated	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	ui-a-Tara	wellbeing of Te Whanganui-a-Tara's groundwater , rivers and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora.			
S288.040	8 Whaitua Te Whanganui-a-Tara	Objective WH.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved to achieve the coastal water objectives set out in Table 8.1.	Support	Not stated	Not stated
S288.041	8 Whaitua Te Whanganui-a-Tara	Objective WH.O3: The health and wellbeing of coastal water	Support	Not stated	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved to achieve the coastal water objectives set out in Table 8.1.			
S288.042	8 Whaitua Te Whanganui-a-Tara	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	Support	Not stated	Not stated
S288.043	8 Whaitua Te Whanganui-a-Tara	Objective WH.O8: Primary contact sites within Te Awa Kairangi/Hutt River, Pākuratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact.	Support	Not stated	Not stated
S288.044	8 Whaitua Te Whanganui-a-Tara	Objective WH.O9: Water	Oppose	Considers the requirement for attribute improvement in all river reaches if TAS is not met in Prt FW management unit monitoring sites does not reflect	Adjust to reflect good management.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	ui-a-Tara	quality, habitats, water quantity and ecological processes of rivers are maintained or improved.		good management. Considers a failure to meet TAS at a part FMU monitoring site should require identification of the problem source and focus on raising TAS performance in that area. Notes TAS in some sub-catchments may already be met and are not practicably able to be improved.	
S288.045	8 Whaitua Te Whanganui-a-Tara	Policy WH.P1: Improvement of aquatic ecosystem health.	Amend	Considers the term 'land use' in sub-clause (d) is more associated with rural or primary production land uses. Seeks the inclusion of urban land use as it is a major source of contaminants.	Clarify to include urban land use.
S288.046	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	Regarding clause (f), notes the specified activities are already actively managed and seeks amendment to reflect management in accordance with established regulatory frameworks and good practice. Suggests similar amendments can be applied for clause (h), noting farm plans themselves are not actions that improve water quality, but are a means to describe good practice, regulations and actions to be applied to a site.	Amend clause (f) to reflect management of specified activities in accordance with established regulatory frameworks and good practice. Consider similar amendments for clause (h).
S288.047	8 Whaitua Te Whanganui-a-Tara	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Oppose	Considers freshwater action plans should be prepared in partnership with mana whenua and the community.	Require Action Plans to be prepared in partnership with mana whenua and the community consultative groups <b>"shall implement the recommendations of the relevant whaitua committees, identifying in detail, the actions, including where relevant, justifiable and effective, additional regulation to achieve the target attribute states as well as other non-regulatory, means to support relevant environmental outcomes"</b> .
S288.048	8 Whaitua Te Whanganui-a-Tara	Policy WH.P4: Achievement of the visual clarity target attribute states.	Neutral	Does not disagree with the aggregated outcome reflected at the WQ monitoring site, however considers there is insufficient WQ monitoring in the wider sub-catchment to determine the primary cause of poor clarity. Therefore considers action to achieve the outcome may be mis-targeted.	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S288.049	8 Whaitua Te Whanganui-a-Tara	Policy WH.P6: Cumulative adverse effects of point source discharges.	Neutral	Notes typo in clause (c)(ii).	Amend clause (c)(ii): in determining the improvement to water quality required in (ii), and...
S288.050	8 Whaitua Te Whanganui-a-Tara	Policy WH.P8: Avoiding discharges of specific products and waste.	Support	Not stated	Not stated
S288.051	8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	Amend	Notes clause (c) does not include temporal matters to be taken into account.	Add a subclause (vi) to account for temporal nature of any discharge.
S288.052	8 Whaitua Te Whanganui-a-Tara	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	Seeks clarification on what woody vegetation can be and for options to be provided.	Make provision for indigenous and exotic permanent forest, subject to controls to provide for better alternative income opportunities for farmers.
S288.053	8 Whaitua Te Whanganui-a-Tara	Policy WH.P25: Managing rural land use change.	Support	Not stated	Not stated
S288.054	8 Whaitua Te Whanganui-a-Tara	Policy WH.P26: Managing livestock access to	Support	Not stated	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		small rivers.			
S288.055	8 Whaitua Te Whanganui-a-Tara	Policy WH.P27: Promoting stream shading.	Support	Not stated	Not stated
S288.056	8 Whaitua Te Whanganui-a-Tara	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Oppose	Considers the policy enables rules based on insufficient data, is not aligned with whaitua committee recommendations, and is not supported by Council's data. Concerned the rules are not practicable and imply write-off of larger areas and neither the efficacy of the existing regulatory framework under the NES-PF/CF, nor the gains of the proposal, have been adequately identified. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector.	Remove policy and reset to recognise substantive deficiencies.
S288.057	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Oppose	Considers the policy sets up a confused pathway between the definitions, policy, general earthworks rules, and forestry earthworks under forestry rules.	Clarify that the policy refers to general earthworks and does not apply to earthworks in forestry. Include new policy covering forestry earthworks and relate to the regulations of the NES-CF separation of earthworks. Objectively assess needs for stringency and utilise NES-CF as intended.
S288.058	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Oppose	Considers the 100g/m3 standard is not related to actual sedimentation levels and is ill-suited to diffuse discharge from land. Notes the measurement method is retrospective rather than real-time. Considers the clarity rule has perverse outcomes, noting that plantation forests often have high macroinvertebrate indices.	Clarify that the policy refers to general earthworks and does not apply to earthworks in forestry.
S288.059	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose	Notes forestry continuously supplies feedstock for industry and markets and cannot be stopped. Notes earthworks are programmed to be done mainly over summer and drier periods, however the policy makes no provision, continuity, nor emergency and maintenance.	Clarify that general earthworks do not apply to forestry. Earthworks for forestry to be undertaken under NES-CF.
S288.060	8 Whaitua Te Whanganui-a-Tara	Rule WH.R1: Point source discharges of specific contaminants - prohibited	Support	Not stated	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		activity.			
S288.061	8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land - permitted activity.	Amend	Notes no threshold is provided for sub-clause (d) and that it is unrealistic. Notes there may be "exacerbation" of flooding to a downslope property if rainfall intensity is severe enough.	Amend to include threshold or other text to recognise high intensity, rainfall events.
S288.062	8 Whaitua Te Whanganui-a-Tara	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Oppose	Considers there is confusion between the definitions and their application. Assumes the rule is intended to apply to urban situations and questions if it applies for forestry land use. Considers the 50 g/m3 threshold for Schedule F1 streams or those with high MCI establishes a perverse outcome, relative to those not on Schedule 1 and low MCI. Notes Map 77 pg 293 and schedule 1 show streams and tributaries include plantations within catchments that have been previously harvested. Notes high MCI recordings are a regular feature of plantation forest streams. Considers the rule potentially penalises productive forestry in these catchments, despite being compatible with NoF/TAS objectives. Therefore considers the rule is permissive to land use in catchments already below standard, and is contrary to policy objectives.	Clarify that rule applies to urban and industrial or similar circumstances. Detach from rural land use and remove potential overlap with forestry regulations. Amend to remove perverse outcomes created by rule - remove grams/m3 discharge requirements and utilise mixing protocols only in rural diffuse discharge situations.
S288.063	8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Oppose	Considers there is confusion between the definitions and their application. Assumes the rule is intended to apply to urban situations and questions if it applies for forestry land use. Considers the 50 g/m3 threshold for Schedule F1 streams or those with high MCI establishes a perverse outcome, relative to those not on Schedule 1 and low MCI. Notes Map 77 pg 293 and schedule 1 show streams and tributaries include plantations within catchments that have been previously harvested. Notes high MCI recordings are a regular feature of plantation forest streams. Considers the rule potentially penalises productive forestry in these catchments, despite being compatible with NoF/TAS objectives. Therefore considers the rule is permissive to land use in catchments already below standard, and is contrary to policy objectives.	Clarify that rule applies to urban and industrial or similar circumstances. Detach from rural land use and remove potential overlap with forestry regulations. Amend to remove perverse outcomes created by rule - remove grams/m3 discharge requirements and utilise mixing protocols only in rural diffuse discharge situations.
S288.064	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater	Oppose	Considers there is confusion between the definitions and their application. Assumes the rule is intended to apply to urban situations and questions if it applies for	Clarify that rule applies to urban and industrial or similar circumstances. Detach from rural land use and remove potential overlap with forestry regulations.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	ui-a-Tara	from new and redeveloped impervious surfaces - discretionary activity.		forestry land use. Considers the 50 g/m3 threshold for Schedule F1 streams or those with high MCI establishes a perverse outcome, relative to those not on Schedule 1 and low MCI. Notes Map 77 pg 293 and schedule 1 show streams and tributaries include plantations within catchments that have been previously harvested. Notes high MCI recordings are a regular feature of plantation forest streams. Considers the rule potentially penalises productive forestry in these catchments, despite being compatible with NoF/TAS objectives. Therefore considers the rule is permissive to land use in catchments already below standard, and is contrary to policy objectives.	Amend to remove perverse outcomes created by rule - remove grams/m3 discharge requirements and utilise mixing protocols only in rural diffuse discharge situations.
S288.065	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Oppose	Considers there is confusion between the definitions and their application. Assumes the rule is intended to apply to urban situations and questions if it applies for forestry land use. Considers the 50 g/m3 threshold for Schedule F1 streams or those with high MCI establishes a perverse outcome, relative to those not on Schedule 1 and low MCI. Notes Map 77 pg 293 and schedule 1 show streams and tributaries include plantations within catchments that have been previously harvested. Notes high MCI recordings are a regular feature of plantation forest streams. Considers the rule potentially penalises productive forestry in these catchments, despite being compatible with NoF/TAS objectives. Therefore considers the rule is permissive to land use in catchments already below standard, and is contrary to policy objectives.	Clarify that rule applies to urban and industrial or similar circumstances. Detach from rural land use and remove potential overlap with forestry regulations. Amend to remove perverse outcomes created by rule - remove grams/m3 discharge requirements and utilise mixing protocols only in rural diffuse discharge situations.
S288.066	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity.	Oppose	Notes sedimentation from the clearance of non-plantation forest vegetation is minimal, that larger clearance such as road alignments are minimised due to cost, and that all other non-plantation forest clearance is avoided or minimised under the NZ forest Accord. Considers the rule creates unnecessary overlap, cost and confusion.	Separate vegetation clearance associated with plantation forest activities from general vegetation clearance and incorporate as already regulated in existing plantations under the NES-CF. Remove rule and align requirement with NES-CF 2023. Vegetation clearance for afforestation remains controlled by Council.
S288.067	8 Whaitua Te Whanganui-a-Tara	Rule WH.R18: Vegetation clearance	Oppose	Notes sedimentation from the clearance of non-plantation forest vegetation is minimal, that larger clearance such as road alignments are minimised due to cost, and that all other non-plantation forest	Separate vegetation clearance associated with plantation forest activities from general vegetation clearance and incorporate as already regulated in existing plantations under the NES-CF. Remove rule and align requirement with NES-CF 2023.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		on highest erosion risk land - controlled activity.		clearance is avoided or minimised under the NZ forest Accord. Considers the rule creates unnecessary overlap, cost and confusion.	Vegetation clearance for afforestation remains controlled by Council.
S288.068	8 Whaitua Te Whanganui-a-Tara	Rule WH.R19: Vegetation clearance - discretionary activity.	Oppose	Notes sedimentation from the clearance of non-plantation forest vegetation is minimal, that larger clearance such as road alignments are minimised due to cost, and that all other non-plantation forest clearance is avoided or minimised under the NZ forest Accord. Considers the rule creates unnecessary overlap, cost and confusion.	Separate vegetation clearance associated with plantation forest activities from general vegetation clearance and incorporate as already regulated in existing plantations under the NES-CF. Remove rule and align requirement with NES-CF 2023. Vegetation clearance for afforestation remains controlled by Council.
S288.069	8 Whaitua Te Whanganui-a-Tara	Rule WH.R20: Plantation forestry - controlled activity.	Oppose	Considers the rules subvert the intent of the NES-PF/CF, are not supported by GWRC data, and promulgate uncertainty, delay and cost unquantified benefit. Considers efficacy of the existing regulatory framework under the NES-PC/CF has not been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector and ignored the recommendations of the whaitua committees.	Remove rule and align requirement with NES-CF 2023.
S288.070	8 Whaitua Te Whanganui-a-Tara	Rule WH.R21: Plantation forestry - discretionary activity.	Oppose	Considers the rules subvert the intent of the NES-PF/CF, are not supported by GWRC data, and promulgate uncertainty, delay and cost unquantified benefit. Notes there may be removal of alternate farm land use income opportunities for afforesting land to be taken out of farming. Considers efficacy of the existing regulatory framework under the NES-PC/CF has not been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector and ignored the recommendations of the whaitua committees.	Remove rule and align requirement with NES-CF 2023.
S288.071	8 Whaitua Te Whanganui-a-Tara	Rule WH.R22: Plantation forestry on	Oppose	Considers the rules subvert the intent of the NES-PF/CF and are not supported by GWRC data. Considers efficacy of the existing regulatory framework under the NES-PC/CF has not been	Remove rule and align requirement with NES-CF 2023.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		highest erosion risk land - prohibited activity.		adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector and ignored the recommendations of the whaitua committees.	
S288.072	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Amend	Considers a 5m minimum setback from surface water bodies from earthworks is contrary to the objectives of the plan. Notes a permissive regime applies to areas under a farm plan and considers this a corollary to the NES-PF/CF. Considers sub-clauses (g) and (h) contradict all other rules, which recognise some discharge will happen.	Align with NES-PF/CF 10m setbacks for perennial streams, set visual discharge standard recognising some discharge always likely to occur. Apply NES-PF/CF inclusive of discharge requirements to forestry, to avoid discriminatory differentiation between land uses.
S288.073	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Oppose	Considers there is a lack of clarity, with potential crossover between policies and rules related to general earthworks and forestry earthworks. Notes there is no provision for emergency works in the earthworks season. Considers the proposed erosion risk method is relative and lacks meaningful accuracy and in-field applicability. Considers a quantitative connection has not been made between forestry activity and actual levels of sedimentation. Considers the need for, and benefit from, added stringency has not been evaluated. Considers the rules contravene the recommendations of the whaitua committees.	Separate earthworks and align with NES-PF/CF.
S288.074	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks - non-complying activity.	Oppose	Considers there is a lack of clarity, with potential crossover between policies and rules related to general earthworks and forestry earthworks. Notes there is no provision for emergency works in the earthworks season. Considers the proposed erosion risk method is relative and lacks meaningful accuracy and in-field applicability. Considers a quantitative connection has not been made between forestry activity and actual levels of sedimentation. Considers the need for, and benefit from, added stringency has not been evaluated. Considers the rules contravene the recommendations of the whaitua committees.	Separate earthworks and align with NES-PF/CF.
S288.075	8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new	Amend	Notes that unlike forestry there is no discharge limit. Notes methods focus on higher erosion land, but ignore that significant sediment generation arises from stock pugging on gentle soils. Considers GWRC data	Review data and rewrite with an objective for consistency in an effects-based rule response.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		greenfield impervious surfaces - controlled activity.		is sparse, however gives insight to possible alignment of sedimentation with national trends, noting that streams with poor TAS included reaches with long exposure to adjacent pastoral and lifestyle farming on gentle terrain. Considers there is inconsistency between land uses and data, and that temporal matters are not taken into account. Considers contaminant generation from a farm is permanent and relative to natural levels elevated, whereas forest land use is elevated during harvesting and roading but rapidly returns to near baseline.	
S288.076	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Amend	Notes that unlike forestry there is no discharge limit. Notes methods focus on higher erosion land, but ignore that significant sediment generation arises from stock pugging on gentle soils. Considers GWRC data is sparse, however gives insight to possible alignment of sedimentation with national trends, noting that streams with poor TAS included reaches with long exposure to adjacent pastoral and lifestyle farming on gentle terrain. Considers there is inconsistency between land uses and data, and that temporal matters are not taken into account. Considers contaminant generation from a farm is permanent and relative to natural levels elevated, whereas forest land use is elevated during harvesting and roading but rapidly returns to near baseline.	Review data and rewrite with an objective for consistency in an effects-based rule response.
S288.077	8 Whaitua Te Whanganui-a-Tara	Rule WH.R28: Livestock access to a small river - permitted activity.	Amend	Considers there will be inadequate protection, noting farm plans provide for management options but may not achieve objectives. Considers there will be inadequate protection, noting farm plans provide for management options but may not achieve objectives. Considers there is a disparity in regulatory approach, noting setback requirements for forestry on all perennial streams with discharge limits. Considers poor TAS can be attributed to source exposure to lowland pastoral agriculture.	Revisit and align to effects driven approach
S288.078	8 Whaitua Te Whanganui-a-Tara	Rule WH.R29: Livestock access to a small river - discretionary	Amend	Considers there will be inadequate protection, noting farm plans provide for management options but may not achieve objectives. Considers there will be inadequate protection, noting farm plans provide for management options but may not achieve objectives. Considers there is a disparity in regulatory approach,	Revisit and align to effects driven approach

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		y activity.		noting setback requirements for forestry on all perennial streams with discharge limits. Considers poor TAS can be attributed to source exposure to lowland pastoral agriculture.	
S288.079	8 Whaitua Te Whanganui-a-Tara	Rule WH.R30: The use of land for farming activities - discretionary activity.	Support	Considers the rule provides for continuation of current activities.	Change and align with objectives of PC1. Allow continuation of activities where permitted standards can not be met, provided river TAS is already compliant. Consider rule sets for activities in TAS compliant streams; OR Adopt an effects-driven approach that is agnostic between land use.
S288.080	8 Whaitua Te Whanganui-a-Tara	Rule WH.R31: Change of rural land use - discretionary activity.	Oppose	Considers the rule contradicts objectives not only to maintain but "improve" water quality. Considers the rule could enable approval of contaminants from land uses up to or beyond TAS thresholds, with little discretion available to assess the margin, or decline in freeboard for a TAS margin. Considers there is conflict with the intent to "improve WQ", and inconsistency with rules that constrain existing activities when TAS targets are already met.	Amend to ensure consistency and neutrality between landuse activities.
S288.081	9 Te Awarua-o-Porirua Whaitua	Objective P.O1: The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100.	Amend	Seeks clarification about "Mauri is restored and waters are in a natural state", noting natural character is not a condition fixed in time. Notes climate change may mean natural character is not the same as current targets, which risks legally enforceable unachievable goals.	Include the caveat that natural character refers to a waterbodies state in response to a variety of input conditions that are managed to achieve a level of naturalness.
S288.082	9 Te Awarua-o-	Objective P.O2: Te	Support	Not stated	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	Porirua Whaitua	Awarua-o-Porirua's groundwater, rivers, lakes and natural wetlands, and their margins are on a trajectory of measurable improvement towards wai ora.			
S288.083	9 Te Awarua-o-Porirua Whaitua	Objective P.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Pāuatahanui Inlet, Onepoto Arm and the open coastal areas of Te Awarua-o-Porirua is maintained or improved to achieve the coastal water objectives set out in Table 9.1.	Support	Not stated	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S288.084	9 Te Awarua-o-Porirua Whaitua	Objective P.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased, and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status.	Support	Not stated	Not stated
S288.085	9 Te Awarua-o-Porirua Whaitua	Objective P.O6: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Oppose	Considers the requirement for attribute improvement in all river reaches if TAS is not met in Prt FW management unit monitoring sites does not reflect good management. Considers a failure to meet TAS at a part FMU monitoring site should require identification of the problem source and focus on raising TAS performance in that area. Notes TAS in some sub-catchments may already be met and are not practicably able to be improved.	Adjust to reflect good management.
S288.086	9 Te Awarua-o-Porirua Whaitua	Policy P.P1: Improvement of aquatic ecosystem	Amend	Regarding (d), considers the term 'land use' is more associated with rural or primary production land uses. Seeks the inclusion of urban land use as it is a major source of contaminants.	Clarify to include urban land use.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		health.			
S288.087	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	Regarding sub-clause (f), notes the specified activities are already actively managed. Suggests similar amendments can be applied for clause (h), noting farm plans themselves are not actions that improve water quality, but are a means to describe good practice, regulations and actions to be applied to a site.	Amend clause (f) to reflect management of specified activities in accordance with established regulatory frameworks and good practice. Consider similar amendments for clause (h).
S288.088	9 Te Awarua-o-Porirua Whaitua	Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Oppose	Considers freshwater action plans should be prepared in partnership with mana whenua and the community.	Amend Policy P.3 as follows: Require Action Plans to be prepared in partnership with mana whenua and the community consultative groups <b>shall implement the recommendations of the relevant whaitua committees, identifying in detail, the actions, including where relevant, justifiable and effective, additional regulation to achieve the target attribute states as well as other non-regulatory, means to support relevant environmental outcomes.</b>
S288.089	9 Te Awarua-o-Porirua Whaitua	Policy P.P4: Contaminant load reductions.	Amend	Not stated	Clarify if land use includes urban land use.
S288.090	9 Te Awarua-o-Porirua Whaitua	Policy P.P5: Localised adverse effects of point source discharges.	Support	Not stated	Not stated
S288.091	9 Te Awarua-o-Porirua Whaitua	Policy P.P6: Point source discharges.	Support	Not stated	Not stated
S288.092	9 Te Awarua-o-Porirua Whaitua	Policy P.P8 Avoiding discharges of specific products and waste.	Support	Not stated	Not stated
S288.093	9 Te Awarua-o-Porirua	Policy P.P9: General stormwater	Amend	Notes clause (c) does not include temporal matters to be taken into account.	Add a subclause (vi) to account for temporal nature of any discharge.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	Whaitua	policy to achieve the target attribute states and coastal water objectives.			
S288.094	9 Te Awarua-o-Porirua Whaitua	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Oppose	Considers there is confusion between the definitions and their application. Assumes the rules is intended to apply to urban situations and questions if it applies for forestry land use.	Clarify that rule applies to urban and industrial or similar circumstances. Detach from rural land use and remove potential overlap with forestry regulations.
S288.095	9 Te Awarua-o-Porirua Whaitua	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Oppose	Considers there is confusion between the definitions and their application. Assumes the rules is intended to apply to urban situations and questions if it applies for forestry land use.	Clarify that rule applies to urban and industrial or similar circumstances. Detach from rural land use and remove potential overlap with forestry regulations.
S288.096	9 Te Awarua-o-Porirua Whaitua	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	Not stated	Amend to provide alternatives. Clarify option for permanent woody vegetation to include exotic tree species, with conditions to provide for alternate economic returns from permanent species.
S288.097	9 Te Awarua-o-Porirua Whaitua	Policy P.P24: Managing rural land use change.	Support	Not stated	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S288.098	9 Te Awarua-o-Porirua Whaitua	Policy P.P25: Promoting stream shading.	Support	Not stated	Not stated
S288.099	9 Te Awarua-o-Porirua Whaitua	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Oppose	Considers the policy enables rules based on insufficient data, is not aligned with whaitua committee recommendations, and is not supported by Council's data. Considers the rules are not practicable and imply write-off of larger areas. Concerned that neither the efficacy of the existing regulatory framework under the NES-PF/CF, nor the gains of the proposal, have been adequately identified. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector.	Remove policy and reset to recognise substantive deficiencies.
S288.100	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Oppose	Considers there is confusion between the definitions, policy, general earthworks rules, and forestry earthworks under forestry rules.	Clarify that the policy refers to general earthworks and does not apply to earthworks in forestry. Include new policy covering forestry earthworks and relate to the regulations of the NES-CF separation of earthworks. Objectively assess needs for stringency and utilise NES-CF as intended.
S288.101	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Oppose	Considers the 100g/m3 standard is not related to actual sedimentation levels and is ill-suited to diffuse discharge from land. Notes the measurement method is retrospective rather than real-time. Considers the clarity rule has perverse outcomes, noting that plantation forests often have high macroinvertebrate indices.	Clarify that the policy refers to general earthworks and does not apply to earthworks in forestry.
S288.102	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose	Notes forestry continuously supplies feedstock for industry and markets and cannot be stopped. Notes earthworks are programmed to be done mainly over summer and drier periods, however the policy makes no provision, continuity, nor emergency and maintenance.	Clarify that general earthworks do not apply to forestry. Earthworks for forestry to be undertaken under NES-CF.
S288.103	9 Te Awarua-o-Porirua Whaitua	Rule P.R1: Point source discharges of specific contaminants - prohibited activity.	Support	Not stated	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S288.104	9 Te Awarua-o-Porirua Whaitua	Rule P.R2: Stormwater to land - permitted activity.	Amend	Notes no threshold is provided for sub-clause (d) and that it is unrealistic. Notes there may be "exacerbation" of flooding to a downslope property is rainfall intensity is severe enough.	Amend to include threshold or other text to recognise high intensity, rainfall events.
S288.105	9 Te Awarua-o-Porirua Whaitua	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.	Oppose	Considers there is confusion between the definitions and their application. Assumes the rules is intended to apply to urban situations and questions if it applies for forestry land use. Considers the 50 g/m3 threshold for Schedule F1 streams or those with high MCI establishes a perverse outcome, relative to those not on Schedule 1 and low MCI. Notes Map 77 pg 293 and schedule 1 show streams and tributaries that include plantations within catchments that have been previously harvested. Notes high MCI recordings are a regular feature of plantation forest streams. Considers the rule potentially penalises productive forestry in these catchments, despite being compatible with NoF/TAS objectives. Considers the rule is permissive to land use in catchments already below standard, and is contrary to policy objectives.	Clarify that rule applies to urban and industrial or similar circumstances. Detach from rural land use and remove potential overlap with forestry regulations. Amend to remove perverse outcomes created by rule - remove grams/m3 discharge requirements and utilise mixing protocols only in rural diffuse discharge situations.
S288.106	9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Oppose	Considers there is confusion between the definitions and their application. Assumes the rules is intended to apply to urban situations and questions if it applies for forestry land use. Considers the 50 g/m3 threshold for Schedule F1 streams or those with high MCI establishes a perverse outcome, relative to those not on Schedule 1 and low MCI. Notes Map 77 pg 293 and schedule 1 show streams and tributaries that include plantations within catchments that have been previously harvested. Notes high MCI recordings are a regular feature of plantation forest streams. Considers the rule potentially penalises productive forestry in these catchments, despite being compatible with NoF/TAS objectives. Considers the rule is permissive to land use in catchments already below standard, and is contrary to policy objectives.	Clarify that rule applies to urban and industrial or similar circumstances. Detach from rural land use and remove potential overlap with forestry regulations. Amend to remove perverse outcomes created by rule - remove grams/m3 discharge requirements and utilise mixing protocols only in rural diffuse discharge situations.
S288.107	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious	Oppose	Considers there is confusion between the definitions and their application. Assumes the rules is intended to apply to urban situations and questions if it applies for forestry land use. Considers the 50 g/m3 threshold for Schedule F1 streams or those with high MCI	Clarify that rule applies to urban and industrial or similar circumstances. Detach from rural land use and remove potential overlap with forestry regulations. Amend to remove perverse outcomes created by rule - remove grams/m3 discharge requirements and utilise mixing protocols only in rural diffuse

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

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				and is contrary to policy objectives.	
S288.110	9 Te Awarua-o-Porirua Whaitua	Rule P.R16: Vegetation clearance on highest erosion risk land-permitted activity.	Oppose	Notes sedimentation from the clearance of non-plantation forest vegetation is minimal, that larger clearance such as road alignments are minimised due to cost, and that all other non-plantation forest clearance is avoided or minimised under the NZ forest Accord. Considers the rule creates unnecessary overlap, cost and confusion.	Separate vegetation clearance associated with plantation forest activities from general vegetation clearance and incorporate as already regulated in existing plantations under the NES-CF. Remove rule and align requirement with NES-CF 2023. Vegetation clearance for afforestation remains controlled by Council.
S288.111	9 Te Awarua-o-Porirua Whaitua	Rule P.R17: Vegetation clearance on highest erosion risk land - controlled activity.	Oppose	Notes sedimentation from the clearance of non-plantation forest vegetation is minimal, that larger clearance such as road alignments are minimised due to cost, and that all other non-plantation forest clearance is avoided or minimised under the NZ forest Accord. Considers the rule creates unnecessary overlap, cost and confusion.	Separate vegetation clearance associated with plantation forest activities from general vegetation clearance and incorporate as already regulated in existing plantations under the NES-CF. Remove rule and align requirement with NES-CF 2023. Vegetation clearance for afforestation remains controlled by Council.
S288.112	9 Te Awarua-o-Porirua Whaitua	Rule P.R18: Vegetation clearance - discretionary activity.	Oppose	Notes sedimentation from the clearance of non-plantation forest vegetation is minimal, that larger clearance such as road alignments are minimised due to cost, and that all other non-plantation forest clearance is avoided or minimised under the NZ forest Accord. Considers the rule creates unnecessary overlap, cost and confusion.	Separate vegetation clearance associated with plantation forest activities from general vegetation clearance and incorporate as already regulated in existing plantations under the NES-CF. Remove rule and align requirement with NES-CF 2023. Vegetation clearance for afforestation remains controlled by Council.
S288.113	9 Te Awarua-o-Porirua Whaitua	Rule P.R19: Plantation forestry - controlled activity.	Oppose	Considers the rules subvert the intent of the NES-PF/CF and are not supported by GWRC data. Considers efficacy of the existing regulatory framework under the NES-PC/CF has not been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector and ignored the recommendations of the whaitua committees.	Remove rule and align requirement with NES-CF 2023.
S288.114	9 Te Awarua-o-Porirua Whaitua	Rule P.R20: Plantation forestry - discretionary activity.	Oppose	Considers the rules subvert the intent of the NES-PF/CF, are not supported by GWRC data, and promulgate uncertainty, delay and cost unquantified benefit. Notes there may be removal of alternate farm land use income opportunities for afforesting land to be taken out of farming. Considers efficacy of the existing regulatory framework under the NES-PC/CF has not	Remove rule and align requirement with NES-CF 2023.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector and ignored the recommendations of the whaitua committees.	
S288.115	9 Te Awarua-o-Porirua Whaitua	Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity.	Oppose	Considers the rules subvert the intent of the NES-PF/CF and are not supported by GWRC data. Considers efficacy of the existing regulatory framework under the NES-PC/CF has not been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector and ignored the recommendations of the whaitua committees.	Remove rule and align requirement with NES-CF 2023.
S288.116	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Amend	Considers a 5m minimum setback from surface water bodies from earthworks is contrary to the objectives of the plan. Notes a permissive regime applies to areas under a farm plan and considers this a corollary to the NES-PF/CF. Considers clauses (g) and (h) contradict all other rules, which recognise some discharge will happen.	Align with NES-PF/CF 10m setbacks for perennial streams, set visual discharge standard recognising some discharge always likely to occur. Apply NES-PF/CF inclusive of discharge requirements to forestry, to avoid discriminatory differentiation between land uses.
S288.117	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks - non-complying activity.	Oppose	Considers there is a lack of clarity, with potential crossover between policies and rules related to general earthworks and forestry earthworks. Notes there is no provision for emergency works in the earthworks season. Considers the proposed erosion risk method is relative and lacks meaningful accuracy and in-field applicability. Considers a quantitative connection has not been made between forestry activity and actual levels of sedimentation. Considers the need for, and benefit from, added stringency has not been evaluated. Considers the rules contravene the recommendations of the whaitua committees.	Separate earthworks and align with NES-PF/CF.
S288.118	9 Te Awarua-o-Porirua Whaitua	Rule P.R25: Farming activities on properties of between 4	Oppose	Notes there is no discharge limit as there is for forestry. Notes methods focus on higher erosion land, but ignore that significant sediment generation arises from stock pugging on gentle soils. Considers GWRC data is sparse, however gives insight to possible	Review data and rewrite with an objective for consistency in an effects-based rule response.

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

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S288.122	12 Schedules	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	Oppose	Considers there is overlap with NES-CF, which creates confusion and adds little value.	Remove and align and incorporate to NES-CF
S288.123	9 Te Awarua-o-Porirua Whaitua	Rule P.R27: The use of land for farming activities – discretionary activity.	Oppose	Effectively provides for continuation of current activities subject to efforts to meet good practice even if unable to meet the permitted activity standards so long as NoF TAS attributes already met in sub-catchment.	Change and align with objectives of PC1. Accept when good practice permitted standards cannot be met and allow continuation of activity provided river TAS already compliant. Highlight discrepancy in approach to different land use. GWRC data indicating NoF/TAS being met in some catchments where forestry activity undertaken for years with limited likelihood of future increases in intensity or expansion.