

FORM 6

**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO,
SUBMISSION ON NOTIFIED PROPOSED POLICY STATEMENT
OR PLAN, CHANGE OR VARIATION**

Clause 8 of Schedule 1, Resource Management Act 1991

To Greater Wellington Regional Council
Environmental Policy
PO Box 11646
Manners Street
Wellington 6142

Name Wellington International Airport Limited (“WIAL”)

- 1. These are further submissions in opposition to or in support of submissions on Proposed Plan Change 1 (“PC1”) to the Natural Resource Plan (“NRP”).**

- 2. WIAL has an interest in PC1 to the NRP that is greater than the interest the general public has within the region.**
 - 2.1 WIAL made a number of original submissions on PC1 to the NRP.
 - 2.2 As set out in WIAL’s original submissions on PC1:
 - 2.2.1 Wellington Airport is managed by WIAL. WIAL is a network utility operator and a requiring authority under section 166 of the Resource Management Act 1991 (“**the RMA** or “**the Act**”);
 - 2.2.2 WIAL owns and operates the regionally and nationally significant Wellington International Airport;
 - 2.2.3 The Airport plays a fundamental role in the social and economic wellbeing of Wellington City, the region and the country;
 - 2.2.4 The Airport provides an important national and international transport link for the local, regional and international community and has a major influence on the regional and national economy;

- 2.2.5 The Airport is also a provider of emergency services and is a lifeline utility under the Civil Defence Emergency Management Act 2002 (“**CDEM 2002**”);
- 2.3 Given WIAL’s role in managing the Airport and as a submitter on the PC1, WIAL has an interest greater than the general public and is concerned to ensure that changes made to the NRP via PC1 appropriately recognise and provide for the Airport and allow it to operate in a safe, efficient and effective manner, whilst ensuring that adverse environmental effects are appropriately avoided, remedied or mitigated, commensurate to the nature and scale of the activity and/or effects.

3. WIAL therefore makes the following further submissions pursuant to clause 8 of the First Schedule to the RMA. Further submissions from WIAL on the Proposed Plan, including the particular parts of the submission that WIAL supports or opposes, and WIAL’s reasons for that support or opposition, are attached to this document in Appendix A.

4. WIAL will not gain an advantage in trade competition through these further submissions.

5. General Reasons for WIAL’s further submissions:

5.1 In its original submission, WIAL emphasised the importance of ensuring that the NRP adequately addresses the following matters (refer to the primary submission for the full suite of considerations):

5.1.1 That regionally significant infrastructure, such as Wellington International Airport, is appropriately recognised and provided for in the NRP. Proposed Plan. That includes through ensuring an appropriate consenting pathway is provided for all activities undertaken by WIAL;

5.1.2 That changes to the NRP intended to give effect to the National Policy Statement for Freshwater Management (“**NPSFM**”) do not create inconsistency with the New Zealand Coastal Policy Statement (“**NZCPS**”) and the remaining sections of the Operative NRP which are not subject to the Proposed NRP and relate to the coastal marine area / coastal environment;

5.1.3 That a pathway remains for WIAL to undertake works within various scheduled areas within the coastal marine area, as per the approach set out in Policy 11 of the NZCPS and the NRP;

5.1.4 That the introduction of new provisions around the unplanned greenfield development does not inadvertently capture activities being undertaken by regionally significant infrastructure, such as WIAL. This includes the

forthcoming seawall renewal project, which is located with a mapped “unplanned greenfield development” area;

5.1.5 The operative approach to providing for a “one stop shop” for WIAL’s stormwater discharges is maintained in the NRP. This approach allows for a more comprehensive and integrated approach for stormwater management across the airport campus.

5.1.6 New earthwork provisions are considered for regionally significant infrastructure that better recognise the frequency and volume of earthworks undertaken by these entities, as well as the need to earthworks to be undertaken year round.

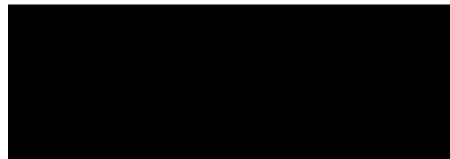
5.1.7 The removal of financial contributions for regionally significant infrastructure, or alternatively, for WIAL, whom treat and manage all of its discharges in an integrated and holistic manner with very limited reliance on the Council infrastructure network.

5.2 WIAL seeks to ensure that the key principles identified in its original submission and summarised above are appropriately recognised and provided for in the Proposed Plan.

5.3 WIAL’s specific further submissions are attached as **Appendix A**.

6. WIAL does wish to be heard in support of these further submissions. If others make a similar submission, WIAL will consider presenting a joint case with them at a hearing.

Signature:



Jo Lester, Planning Manager,
Wellington International Airport Limited

Date: 8 March 2024

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ANNEXURE A – Wellington International Airport Limited further submissions on Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region

Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
Objectives					
Objective O19: Biodiversity, aquatic ecosystem health and mahinga kai in freshwater bodies and the coastal marine area are safeguarded.	Wellington Water Limited S151.038	Neutral	Retain application to a water bodies in a coastal area/whaia Other references may be required to address the issues identified, including reference that is a natural, additional or consequential.	Support in part	WAL supports the retention of the Operational NRP provisions where further works are required to be undertaken to confirm the appropriateness or otherwise of other provisions within the NRP. WAL supports the retention and application of Objective O19 where further works being undertaken on the appropriateness or otherwise of target attribute states.
Table 3.7 Natural Wetlands	Wellington Water Limited S151.04	Neutral	Retain where further detail on Target Attribute States is developed.	Support in part	WAL supports the retention and application of Table 3.7 where further works being undertaken on the appropriateness or otherwise of target attribute states.
5.2 and 5.3 Discharges to Land and Water and Land Use Rules					
Rule R101: Earthworks – permitted activity.	Transpower New Zealand Limited S177.015	Oppose	Retain rule R101 so that it continues to apply in Whaia Te Whanganui-a-Tara and Te Awarua-o-Porua Whaia.	Support	WAL supports the recommended reference and agrees that the operational rule provides reasonable conditions for undertaking other earthworks that are less than 3,000m2 that are not otherwise permitted by WH.R23 and P.R22.
8 Whaia Te Whanganui-a-Ta					
Objective WH.O1: The health of a freshwater bodies and the coastal marine area within Whaia Te Whanganui-a-Tara is progressively improved and sustained by 2100.	Transpower New Zealand Limited S177.018	Amend	That Objective WH.O1 be amended as follows: Note in the waiver state: Ahua (natural character) is restored to the extent that this is possible, and freshwater bodies exhibit the natural quality, rhythms, range of flows, form, hydrology and character. 	Support in part.	WAL supports in part, the reference sought and agrees that restoration of natural character in relation to a freshwater bodies and coastal marine areas is not a reasonably achievable objective where existing regulatory significant infrastructure is located over or within freshwater bodies or the coastal marine area.
	Hutt City Council S211.006	Support	That Objective WH.O1 be amended as follows: Note in the waiver state: -A freshwater bodies have protected margins <u>where possible</u> .	Support	WAL supports the qualified reference to freshwater bodies being protected margins as this acknowledges that this is not always physically possible (i.e. due to space constraints) to appropriate (due to operational and functional requirements of regulatory significant infrastructure) to provide for protected margins, particularly where those freshwater bodies are highly modified.
	Kāinga Ora S257.010	Not stated	Mostly supportive of the proposed objectives but notes that some objectives would be difficult to achieve. Seeks outcomes across PC1 to ensure the Plan Change does not extend beyond that necessary to implement the NPS-FM, noting the considerable additional regulatory burden	Support in part	WAL supports alignment with the NPSFM and in doing so, considers this appropriate to ensure PC1 recognises that specified infrastructure and other forms of development are provided a specific policy and consenting pathway that also needs to be reflected in the plan change.

Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
			such a framework imposes upon a range of stakeholders.		
	Environmental Defence Society S222.022	Amend	To give effect to the NPSFM. Delete "Note" so that the water state has equal effect as part of the objective. Amend 2100 to 2050 to reflect the urgency of addressing freshwater issues and the biodiversity crisis.	Oppose in part	While WIAL supports the intent of the submission that PC1 should give effect to the NPSFM, it is imperative to ensure that in achieving this outcome, all elements of the NPSFM are appropriately recognised and provided for, including the specific policy approach for specified infrastructure.
Objective WH.02: The health and wellbeing of Te Whanganu-a-Tara's groundwater, rivers and natural wetlands and the rivers margins are on a trajectory of measurable improvement towards water.	Environmental Defence Society S222.023	Amend	Consistency with the and give effect to the NPSFM. include reference to natural form and character in the objective (under (a) and refer to ecosystem health as this more consistent with the NPSFM.	Oppose in part	While WIAL supports the intent of the submission that PC1 should give effect to the NPSFM, it is imperative to ensure that in achieving this outcome, all elements of the NPSFM are appropriately recognised and provided for, including the specific policy approach for specified infrastructure.
	Forest and Bird S261.020	Amend	Amend as follows: The health and wellbeing of Te Whanganu-a-Tara's groundwater, rivers, <u>ephemeral watercourses</u> , and natural wetlands and the river margins are on a trajectory of measurable improvement towards water, such that by 2030 2040 : include reference to natural form and character in clause (a) and refer to ecosystem health .e.: "(a) water quality, habitats, <u>natural form and character</u> ... are at a level where the state of aquatic ecosystem health is meaningfully improved..." Any further consequential or alternative references may be necessary and appropriate to address concerns.	Oppose in part	While WIAL supports the intent of the submission that PC1 should give effect to the NPSFM, it is imperative to ensure that in achieving this outcome, all elements of the NPSFM are appropriately recognised and provided for, including the specific policy approach for specified infrastructure.
Objective WH.03: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganu-a-Tara's mainstem or improved to achieve the coastal water objectives set out in Table 8.1	Wellington Fish and Game Regional Council S188.033	Amend	Amend Clause c): (c) diversity, abundance, composition, structure, and condition of mahinga ka species and communities, <u>including valued introduced species</u> , has increased.	Oppose	While WIAL acknowledges that some indigenous freshwater species are afforded specific recognition under different statutes, the use of the term "valued introduced species" goes significantly further than those requirements.
Table 8.1 Coastal Water Objectives	Environmental Defence Society S222.025 Forest and Bird S261.052	Amend	include a parameter for Turbidity. Wording for parameter is as follows: <u>Unit: NTU; Statistic: Turbidity must be maintained at or below the current annual median or at or below pre-existing levels, whichever is lesser; Te Whanganu-a-Tara Harbour and estuary, Makara Estuary, Waiuomata Estuary: <6.9; Waita: No discernible change).</u>	Oppose	WIAL opposes to the new parameters and is unsure, from a section 32 perspective, whether these additions are appropriate within the coastal environment and if so, if they are set at an appropriate level.



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			<p>Add further parameters (for example lead, dissolved oxygen, temperature, pH, secch depth, chlorophyll-a, total phosphorous, total nitrogen, nitrate-nitrogen, ammonia nitrogen, and faecal coliforms) to ensure narrative objectives in Table 3.8 of the Operational Plan are met. Amend Waitaunui for Enterococci: <200 <40</p> <p>Add nutrient meframes as per NPSFM 3.11.</p>		
Objective WH.09: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Environmental Defence Society Inc S222.032 Forest and Bird S261.060	Amend	Considers natural form and character a key value of rivers and streams in the Whanganui-a-Tara area and is directed as a potential value in the NPSFM. Considers protection of natural form and character is required to protect habitat.	Oppose	While WIAL supports the intent of the submission that PC1 should give effect to the NPSFM, it is imperative to ensure that the achievement of this outcome, the elements of the NPSFM are appropriately recognised and provided for, including the specific policy approach for specified infrastructure.
Policy WH.P1: Improvement of aquatic ecosystem health.	Environmental Defence Society Inc S222.034 Forest and Bird S261.062	Amend	To give effect to NPSFM. Seeks explicit provisions for natural form and character.	Oppose	While WIAL supports the intent of the submission that PC1 should give effect to the NPSFM, it is imperative to ensure that the achievement of this outcome, the elements of the NPSFM are appropriately recognised and provided for, including the specific policy approach for specified infrastructure.
Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Wellington City Council S33.035	Amend	Amend as follows: Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Act on Plans, by: (a) prohibiting unpermitted greenfield development for other greenfield developments in maintaining the contaminants and requiring contaminants and requiring financial contributions as to offset adverse effects from residential stormwater contaminants, and (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, <u>through stormwater management strategies</u> and...	Support in part	WIAL supports the general trajectory of this amendment and agrees with the submitter that the section 32 evaluation does not demonstrate the prohibition of unpermitted greenfield development as being the most appropriate to achieve the objectives of the plan.
	Summerset Group Holdings Limited S38.005		Amend policy as follows Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Act on Plans, by:	Support in part	WIAL shares the concerns of the submitter that the activity status that ensues from this policy provides no consenting pathway for proposals located in these areas that may have positive/better outcomes for the community and freshwater, nor has it been sufficiently justified in terms of section 32 of the RMA.

Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
			(a) prohibiting unpermitted greenfield development and for other greenfield developments in managing the contaminants from greenfield developments and requiring financial contributions as to offset adverse effects from residual stormwater contaminants; (b)		
	Transpower New Zealand Limited S177.020 Ara Poutama Aotearoa the Department of Corrections	Amend	Amend the policy as follows: Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulated discharges and use activities in the Plan, and non-regulatory methods, including Freshwater Act on Plans, by: (a) prohibiting unpermitted greenfield development and for other greenfield developments in managing the <u>discharge of stormwater</u> contaminants from <u>greenfield development</u> , and <u>where residual adverse effects from the discharge of stormwater contaminants are more than minor</u> , requiring <u>aquatic offsetting or compensation (which may include financial contributions)</u> as to offset adverse effects from residual stormwater contaminants, and (b) ...	Support in part	WAL shares the concerns of the submitter that the definition of "unpermitted greenfield development" is broad, uncertain, and could prohibit maintenance, upgrading and development of regionally significant infrastructure. Consider prohibition on unpermitted greenfield development is inappropriate and must be removed.
	Forest and Bird S222.035	Amend	To give effect to the NPSFM. Amend (f) to require avoidance of significant adverse effects from earthworks, forestry and vegetation clearance activities. Support removal of stock from waterbodies and the coastal environment.	Oppose	While WAL supports the intent of the submission that PC1 should give effect to the NPSFM, it is imperative to ensure that in achieving this outcome, all elements of the NPSFM are appropriately recognised and provided for, including the specific policy approach for specified infrastructure. WAL is also concerned that the proposed requirement to avoid significant adverse effects is too broad and needs to be qualified and tied back to the chapeau of the policy (i.e. significant adverse effects of earthworks on target attribute states and coastal water objectives).
	Upper Hutt City Council S225.067	Oppose	Seek that the policy is amended to read: ... (a) prohibiting management unpermitted greenfield development and for other greenfield developments in managing the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and"	Support in part	WAL supports the proposed amendments to mb (a) and agrees that that the proposed prohibition undermines the District Plan changes and reviews currently underway or proposed in future.
	S245 Tama Potaka, Minister of Conservation S245.003	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Oppose in part	While WAL considers it appropriate for the policy intent to be generally consistent with Policy 23 of the NZCPS, the extent of those changes is unclear.



Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
			Amend Policies to be consistent with NZCPS Policy 23. Requests the following wording be added Promoting design options that reduce flows to stormwater retention systems at source.		WAL also notes that the policy relates to freshwater and coastal water. Care therefore needs to be taken to ensure that any potential drafting amendments do not inappropriately conflict the requirements of the NPSFM and NZCPS.
	Ka nga Ora S257.011	Oppose	Remove reference to prohibiting unapproved greenfield development at WH.P2(a).	Support	WAL agrees with the submitter that prohibition of unapproved greenfield developments inappropriate and has not been appropriately evaluated in terms of section 32 of the RMA.
	Forest and Biodiversity 261.063	Amend	Amend (a) as follows: ... prohibiting unapproved greenfield development and for other greenfield developments minimising the contaminants so that adverse effects are avoided and requiring finance contributions as to offset adverse effects from residual stormwater contaminants Amend clause (e) so that it refers to ephemeral watercourses, wetlands and estuaries. Add clause () and use intensification that individual or cumulative may lead to a decline in water quality is prohibited. Any further consequential or alternative references may be necessary and appropriate to address concerns.	Oppose	The proposed amendments are too vague and do not qualify the nature of the effects that are to be avoided (i.e. adverse effects on what) or the significance (i.e. adverse effects, regardless of the resource). The proposed new () does not recognise that water quality improvements need to be achieved on a catchment wide basis. As drafted, fully compliant discharges would effectively be prohibited which is inappropriate.
Policy WH.P5: Localised adverse effects of point source discharge.	Tama Potaka, Minister of Conservation S245.004	Amend	Requests a new part which includes the relevant criteria from NZCPS Policy 23 (f). Wording proposed is as follows: <u>and by</u> <u>(f) using the smallest maximum zone necessary to achieve the required water quality in the receiving environment;</u> <u>and</u> <u>(g) minimising adverse effect on the life-supporting capacity of water within a maximum zone.</u>	Oppose in part	While WAL considers it appropriate for the policy content to be generally consistent with Policy 23 of the NZCPS, the policy relates to freshwater and coastal water. Care therefore needs to be taken to ensure that any potential drafting amendments do not inappropriately conflict the requirements of the NPSFM and NZCPS. Grammarly, (g) does not fit with the drafting of the policy.
Policy WH.P8: Avoiding discharges of specific products and waste.	Tama Potaka, Minister of Conservation S245.006	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Oppose in part	While WAL considers it appropriate for the policy content to be generally consistent with Policy 23 of the NZCPS, the extent of those changes is unclear. WAL also notes that the policy relates to freshwater and coastal water. Care therefore needs to be taken to ensure that any potential drafting amendments do not inappropriately conflict the requirements of the NPSFM and NZCPS.
	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies S258.011	Amend	Amend Policy WH.P8, as follows: Policy WH.P8: Avoiding discharges of specific products and waste Avoid, as a first priority, discharges to freshwater and coastal water, including where this is via the stormwater network, of:	Support	WAL agrees that this is appropriate for the policy to consider accidental discharges.



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			<p>(a) chem ca c ean ng products, pa nt, so vents, fue s and coo ant, o , wet cement products and dr coo ng water, or</p> <p>(b) an ma eff uent from an an ma eff uent storage fac ty or from an area where an ma s are conf ned, or</p> <p>(c) untreated ndustr a or trade waste, or</p> <p>(d) untreated organ c waste or eachate from storage of organ c mater a .</p> <p><u>Where there s a res dua r sk of a d scharge of the substances sted n (a) to (d) above, nc ud ng any acc denta sp age, management measures are mp emented to conta n and/or treat the d scharge to avo d or m t gate adverse effects on freshwater or coasta water.</u></p>		
	Forest and B rd S261.070	Amend	<p>Seeks for referenced d scharges to be broadened to nc ude anyth ng at a concentrat on that may k f sh.</p> <p>Add causes:</p> <p><u>(e) rubb sh</u></p> <p><u>(f) agr chem ca s, fert sers, pers stent chem ca s</u></p> <p><u>(g) any other mater a that may k f sh</u></p>	Oppose	Wh e W AL does not have any part cu ar ssue w th restr ct ons be ng mp osed that seek to ensure d scharges are not at concentrat ons (after the zone of reasonab e m x ng) that wou d cause f sh morta ty, th s outcome s not ref ected n the spec f c re ef sought by the subm tter. The re ef sought s much broader and therefore requ res cons derab e ref nement.
Po cy WH.P9: Genera stormwater po cy to ach eve the target attr bute states and coasta water object ves.	CentrePort L m ted S90.004		Support the ntent of the po cy	Support	W AL supports the ntent of Po cy WH.P9.
	Tama Potaka, M n ster of Conservat on S245.007	Amend	Supports the ntent of the po cy but t needs to be cons stent w th NZCPS Po cy 23.	Oppose n part	<p>Wh e W AL cons ders t appropri ate for the po cy ntent to be genera y cons stent w th Po cy 23 of the NZCPS, the extent of those changes s unc ear.</p> <p>W AL a so notes that the po cy re ates to freshwater and coasta water. Care therefore needs to be taken to ensure that any potent a draft ng amendments do not nappropri ate y conf ate the requ rements of the NPSFM and NZCPS.</p>
Po cy WH.P10: Manag ng adverse effects of stormwater d scharges.	We ngton C ty Counc S33.043	Amend	<p>Amend as fo ows:</p> <p>Po cy WH.P10: Manag ng adverse effects of stormwater d scharges</p> <p>A stormwater d scharges and assoc ated and use act v tes <u>that s not managed by a stormwater management strategy sha be managed by...</u></p>	Support	W AL ho ds an ex st ng g oba stormwater d scharge perm t wh ch nc udes a comprehens ve stormwater management p an. W AL therefore agrees that t s appropri ate for such c rcumstances to be recogn sed w th n the po cy (and methods) to avo d ng consent ng over ap and dup cat on.
	Summerset Group Ho d ngs L m ted S38.006	Amend	Rev ew po cy and ru e framework for the treatment of stormwater, and prov de techn ca standards for acceptab e so ut ons.	Oppose n part	Wh e W AL has no ssue w th the ntent of the subm ss ons, W AL s unc ear of the nature or extent of the changes be ng proposed.

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	Hutt City Council S211.013	Amend	Develop more comprehensive objectives and policies for hydrological control and WSUD measures including acceptable solutions and amend policy.	Oppose in part	Where WIAL has no issue with the content of the submissions, WIAL is unclear of the nature or extent of the changes being proposed.
	Upper Hutt City Council S225.075	Amend	The scope of this policy should be narrowed to apply only to stormwater networks not including developments within a network, except for point source discharges to surface water. This should not apply to one house or rural scenarios which discharge directly to and via soak pits or other similar systems.	Oppose in part	Where WIAL has no issue with the content of the submissions, WIAL is unclear of the nature or extent of the changes being proposed.
	Tama Potaka, Minister of Conservation	Amend	Supports the content of the policy but it needs to be consistent with NZCPS Policy 23.	Oppose in part	Where WIAL considers it appropriate for the policy content to be generally consistent with Policy 23 of the NZCPS, the extent of those changes is unclear. WIAL also notes that the policy relates to freshwater and coastal water. Care therefore needs to be taken to ensure that any potential draft amendments do not inappropriately conflict the requirements of the NPSFM and NZCPS.
	New Zealand Transport Agency	Amend	Modify WH.P10(a) to provide for flexibility where the stormwater network operator does not have full mandate over the contaminant source. Any further alternative or consequential references may be necessary to fully achieve the reference sought.	Support	WIAL operates and maintains a stormwater management system that includes stormwater captured from surrounding residential areas. WIAL therefore supports the proposed amendments as WIAL does not have control over the contaminant source.
Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Transpower New Zealand Limited S177.021 Ara Poutama Aotearoa the Department of Corrections S248.021	Amend	Amend policy as follows: Policy WH.P11: Discharges of contaminants <u>hazardous substances</u> in stormwater from high risk industrial or trade premises The discharge of stormwater to water, including risk industrial or trade premises shall be managed by: (a) having procedures and equipment in place to contain any spillage of hazardous substances for storage or removal, and (b) avoiding contaminants or hazardous substances being entrained in stormwater and discharged to a surface water body or coastal water, including via the stormwater network, or where avoidance is not practicable, implementing good management practice to avoid or minimise adverse effects on the environment, including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and 	Support	WIAL agrees with the submitter that this impact can be avoided by other policies.
	Tama Potaka, Minister of Conservation S245.009	Amend	Supports the content of the policy but it needs to be consistent with NZCPS Policy 23.	Oppose in part	Where WIAL considers it appropriate for the policy content to be generally consistent with Policy 23 of the NZCPS, the extent of those changes is unclear.



Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
					W AL a so notes that the po cy re ates to freshwater and coasta water. Care therefore needs to be taken to ensure that any potent a draft ng amendments do not n appropri ate y conf ate the requ rements of the NPSFM and NZCPS.
	Forest and B rd S261.073	Amend	Cons ders h gher eve s of contro are requ red where stormwater s com ng from a h gh r sk ocat on. Requ re resource consent for d scharges of stormwater from h gh r sk areas. Any further consequent a or a ternat ve re ef as may be necessary and appropri ate to address concerns.	Oppose	n the absence of spec f c draft ng, W AL opposes th s re ef.
Po cy WH.P12: Manag ng stormwater from a port or a rport.	Tama Potaka, M n ster of Conservat on S245.010	Amend	Supports the ntent of the po cy but t needs to be cons stent w th NZCPS Po cy 23.	Oppose n part	Wh e W AL cons ders t appropri ate for the po cy ntent to be genera y cons stent w th Po cy 23 of the NZCPS, the extent of those changes s unc ear.
	Forest and B rd S261.074	Amend	Cons ders h gher eve s of contro are requ red where stormwater s com ng from a h gh r sk ocat on. Requ re resource consent for d scharges of stormwater from h gh r sk areas. Any further consequent a or a ternat ve re ef as may be necessary and appropri ate to address concerns.	Oppose	n the absence of spec f c draft ng, W AL opposes th s re ef.
Po cy WH.P14: Stormwater d scharges from new and redeve oped mperv ous surfaces.	We ngton C ty Counc (S33.046)	Oppose	De ete the po cy as not f ed.	Support	n the absence of the re ef sought by W AL n ts subm ss on, W AL supports the de et on of th s po cy.
	Upper Hutt C ty Counc	Amend	Amend the def n t on of redeve opment and rev ew the pract ca y of thresho ds where th s po cy app es.	Support n part	W AL supports a substant ve rev ew of th s po cy.
	Tama Potaka, M n ster of Conservat on S245.012	Amend	Supports the ntent of the po cy but t needs to be cons stent w th NZCPS Po cy 23.	Support n part	Wh e W AL cons ders t appropri ate for the po cy ntent to be genera y cons stent w th Po cy 23 of the NZCPS, the extent of those changes s unc ear. W AL a so notes that the po cy re ates to freshwater and coasta water. Care therefore needs to be taken to ensure that any potent a draft ng amendments do not n appropri ate y conf ate the requ rements of the NPSFM and NZCPS.
	Taranak Whānu S286.045		Deve op a more comprehens ve framework for hydro og ca contro and water sens t ve urban des gn measures, nc ud ng acceptab e techn ca so ut ons.	Support n part	W AL supports a substant ve rev ew of th s po cy.
Po cy WH.P15: Stormwater contam nant offsett ng for new greenf e d deve opment.	We ngton C ty Counc S33.047	Oppose	De ete the po cy as not f ed.	Support	n the absence of the re ef sought by W AL n ts subm ss on, W AL supports the de et on of th s po cy.

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	Tama Potaka, Minister of Conservation S245.0113	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Oppose in part	<p>When WIAL considers it appropriate for the policy intent to be generally consistent with Policy 23 of the NZCPS, the extent of those changes is unclear.</p> <p>WIAL also notes that the policy relates to freshwater and coastal water. Care therefore needs to be taken to ensure that any potential drafting amendments do not inappropriately conflict the requirements of the NPSFM and NZCPS.</p>
Policy WH.P16: Stormwater discharges from new unplaned greenfield development	Summerset Group Holdings Limited S38.009	Oppose	Delete the policy.	Support	WIAL shares the concerns of this submitter that the activity status stemming from this policy provides no consenting pathway for proposals located in these areas that may have positive/better outcomes for the community or freshwater. WIAL also agrees that the use of a prohibited activity status is not justified in the Section 32 Evaluation.
	Transpower New Zealand Limited S177.024 Ara Poutama Aotearoa the Department of Conservation S248.024	Oppose	Delete the policy.	Support	WIAL agrees that the term unplaned greenfield development is too broad and uncertain and how the approach could prohibit works on regional significant infrastructure in areas identified as "unplaned greenfield development areas".
	Upper Hutt City Council S225.079	Oppose	Delete policy or amend significantly to change from 'avoid' to 'minimise' and specify that this should not apply to developments that feed into an existing stormwater network that will have an existing stormwater consent.	Support in part	WIAL supports the deletion of this policy, however notes that if the avoidance directive is to be amended to minimise, further amendments are still required to the policy to address the concerns raised in WIAL's submission.
	Tama Potaka, Minister of Conservation S245.0112	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Oppose in part	<p>When WIAL considers it appropriate for the policy intent to be generally consistent with Policy 23 of the NZCPS, the extent of those changes is unclear.</p> <p>WIAL also notes that the policy relates to freshwater and coastal water. Care therefore needs to be taken to ensure that any potential drafting amendments do not inappropriately conflict the requirements of the NPSFM and NZCPS.</p>
	Ka ngā Ora S257.021	Oppose	Delete the policy. Alternatively, amend the proposed policy to provide a pathway where the effects from additional stormwater discharges can be managed appropriately.	Support in part	WIAL supports the submitters' recommendation that the policy be deleted or a policy pathway be provided where the effects from stormwater discharges can be appropriately managed.
Policy WH.P29: Management of earthworks.	Transpower New Zealand Limited S177.025 Ara Poutama Aotearoa the Department of Corrections S248.026	Amend	<p>Amend Policy WH.P29 as follows:</p> <p>Management of earthworks</p> <p>The risk adverse effects of sediment discharges from earthworks shall be managed by:</p> <p>(a) requiring retention in minimising the uncontrolled loss of soil and sediment on the land using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in accordance with the GWRC Erosion and Sediment Control Guide for the Wellington Region (2021), for the duration of the land disturbance, and</p> <p>(b) limiting, where practicable, the amount of land disturbed at any time, and</p> <p>(c) ...</p>	Support in part	<p>WIAL supports the focus of the policy onto effects (as per the RMA).</p> <p>In addition to the scenario used in WIAL's submission, WIAL also agrees that some sediment may need to be discharged to a canal, therefore not retaining on site.</p> <p>WIAL also agrees that it is appropriate to qualify the requirement to recognise that limits placed on and disturbance should be reasonable and proportionate, particularly where good management practices are already in place.</p>

Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
	Forest and B rd S261.090	Amend	Add new clause:(x) requiring setback distances, of no less than 10 metres, from surface water bodies, ephemeral watercourses, and the coastal marine area. Any further consequential or alternative effects may be necessary and appropriate to address concerns.	Oppose	The proposed amendments do not recognise that in some circumstances, earthworks may be required within or directly or indirectly adjacent to waterbodies (fresh and coastal). It is a so not clear what policy directives such activities would subsequently be considered under.
Policy WH.P31: Water shut down of earthworks.	Wellington Water Limited S151.089	Oppose	Amend to provide an exemption for Regional Significance Infrastructure.	Support	WAL agrees that an exemption should be provided for regional significance infrastructure, as set out in WAL's submission.
8.3 Rules					
Rule WH.R1: Point source discharges of specific contaminants - prohibited activity.	Wellington City Council S33.056 BP South NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd – The Fuel Companies S258.017 NZ Transport Agency S275.019	Oppose	Delete the rule	Support in part	WAL supports the reference to the extent that it addresses the matters raised in WAL's or gna submission.
	Fulton Hogan S43.014	Oppose	Amend the rule as follows: Point source discharges of specific contaminants - prohibited activity The point source discharge of <u>more than incidental levels of:</u> (a) chemical cleaning products including vehicle cleaning products <u>and detergents unless these are biodegradable and non-ecotoxic, biodegradable and disinfectant, or</u> (g) cement slurry, or cement wash <u>cement slurry and concrete cutting waste unless these have been captured and treated to achieve a pH required by the water quality standards for the receiving waterbody, or</u> ..	Support in part	WAL supports the reference to the extent that it addresses the matters raised in WAL's or gna submission.
	Upper Hutt City Council S225.094	Oppose	Delete or significantly rewrite to a more specific and reasonable approach. If a rule is retained, seek a more permissive activity status such as restricted discretionary.	Support in part	WAL supports the reference to the extent that it addresses the matters raised in WAL's or gna submission.
Rule WH.R5 Stormwater from new and redeveloped impervious surfaces – Permitted activity	CentrePort Limited S93.006	Amend	Amend the rule as follows The use of and for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urban land property) and the associated discharge of stormwater into water, or onto or into and where it may enter a surface water body or coastal water, including	Support	WAL supports the clarification sought by CentrePort and considers the reference generally consistent with that sought by WAL with respect to RULE WH.R1 to R7.

Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
			through an existing or new local authority stormwater network, that is not a high risk industrial or trade premises or unpermitted greenfield development, or a port or a rport. is a permitted activity, provided the following conditions are met: ... <u>For the creation of new or redevelopment of existing impervious surfaces and associated discharge of stormwater from a port or a rport, refer to WH.R8.</u>		
Rule WH.R6: Stormwater from new greenfield impervious surfaces – controlled activity	Wellington City Council S33.061	Oppose	Delete the rule	Support in part	WAL supports the rule to the extent that it addresses the matters raised in WAL's original submission.
	Upper Hutt City Council S225.099	Oppose	Delete or amend to remove thresholds and conditions.	Support in part	WAL supports the rule to the extent that it addresses the matters raised in WAL's original submission.
Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urban sealed areas - controlled activity.	Wellington City Council S33.062	Oppose	Delete the rule	Support in part	WAL supports the rule to the extent that it addresses the matters raised in WAL's original submission.
	CentrePort Limited S93.006	Amend	Amend the rule as follows Stormwater from new and redeveloped impervious surfaces of existing urban sealed areas - controlled activity The use of and for the creation of new and/or redevelopment of impervious surfaces of an existing urban sealed property and the associated discharge of stormwater into water, or onto or into and where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not a high risk industrial or trade premises, or a port or a rport, is a controlled activity, provided the following conditions are met: Note For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to Rule WH.R11. ... <u>For the creation of new or redevelopment of existing impervious surfaces and associated discharge of stormwater from a port or a rport, refer to WH.R8.</u>	Support	WAL supports the clarification sought by CentrePort and considers the rule's generally consistent with that sought by WAL with respect to RULE WH.R1 to R7.
	Upper Hutt City Council S225.100	Oppose	Delete or amend to remove thresholds and conditions.	Support in part	WAL supports the rule to the extent that it addresses the matters raised in WAL's original submission.

Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
Ru e WH.R8: Stormwater from a port or a rport - restr cted d scret onary act v ty.	CentrePort S93.008	Amend	Amend the ru e as fo ows: Stormwater from a port or a rport- restr cted d scret onary act v ty <u>The use of and for the creat on of new and/or redev opment of ex st ng mperv ous surfaces and the assoc ated</u> d scharge of stormwater from a port or a rport nto water, or onto or nto and where t may enter a surface water body or coasta water, nc ud ng through a oca author ty stormwater network, s a restr cted d scret onary act v ty where ... <u>Note Ru es WH.RS and WH.R7 do not app y to d scharges of stormwater from a port or a rport.</u>	Support	W AL supports the c ar f cat on sought by CentrePort and cons ders the re ef s genera y cons tent w th that sought by W AL w th respect to Ru es WH.R1 to R7 and R11 to R12..
	Tama Potaka, M n ster of Conservat on S245.047	Amend	Amend Po c es to be cons tent w th NZCPS Po cy 23(4)(a) to (d)	Oppose n part	Wh e W AL cons ders t appropri ate for the ru e to g ve effect to the NZCPS (a prov s ons, not just Po cy 23), the extent of the changes proposed by the subm tter s unc ear.
	Taranak Whānu S286.072	Amend	Amend ru e to mprove c ar ty. Supports n pr nc p e, and supports mah nga ka , Māor customary use and effects on Schedu e C (mana whenua) s tes be ng matters of d scret on. Notes t s unc ear f mah nga ka s tes and Māor customary use so e y refers to s tes sted n schedu es B and H respect ve y. Notes th s s ncons tent throughout PC1 and references WH.R8 as an examp e wh ch spec f ca y refers to Schedu e H for Māor customary use.	Support	W AL agrees that t wou d be usefu f further c ar ty around the nterpretat on of matter of d scret on 1 cou d be c ar f ed.
Ru e WH.R11: Stormwater from new and redev oped mperv ous surfaces - d scret onary act v ty.	We ngton C ty Counc S33.065		De ete the ru e n ts ent rety	Support n part	W AL supports the re ef to the extent that t addresses the matters ra sed n W AL's or g na subm ss on.
Ru e WH.R12: A other stormwater d scharges - non-comp y ng act v ty.	CentrePort S93.009	Oppose	Reta n d scret onary act v ty status for act v tes that cannot comp y w th Ru e WH.R8.	Support	W AL supports the retent on of a d scret onary act v ty status for A rport and Port d scharges and cons ders the non-comp y ng act v ty status has not been appropri ate y eva uated n terms of sect on 32 of the RMA.
	Ara Poutama Aotearoa the Department of Correct ons	Amend	Ru e WH.R12: A other stormwater d scharges non-comp y ng d scret onary act v ty (and subsequent amendments)	Support	W AL supports the ru e cascade to d scret onary for d scharges that cannot comp y w th Ru es R1 to R11 and cons ders a non-comp y ng act v ty status has not been adequate y just f ed under sect on 32 of the RMA.
Ru e WH.R13: Stormwater from new unp anned greenf ed deve opment - proh b ted act v ty.	We ngton C ty Counc S33.067 Summerset Group Ho d ngs L m ted S38.017 Transpower New Zea and L m ted S177.037	Oppose	De ete ru e.	Support n part	W AL supports the re ef to the extent that t addresses the matters ra sed n W AL's or g na subm ss on.



Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
	Upper Hutt City Council S225.104				
	Ara Poutama Aotearoa the Department of Conservation S248.037				
	Kāinga Ora S257.033				
Rule WH.R23: Earthworks - permitted activity.	Wellington Water Ltd S151.099	Amend	Amend to restate the exemptions for certain earthworks activities as exist for 'other Wha tua',	Support in part	WAL supports the reference to the extent that it addresses the matters raised in WAL's original submission, particularly with respect to the definition of earthworks and the exemptions afforded to the A report.
	Forest and Bird	Oppose	Amend as follows: (d) the earthworks shall not occur within, or within a 10-5m setback from, of a surface water body, ephemera watercourse, or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks shall not be placed where it can enter a surface water body, ephemera watercourse, or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there shall be no discharge of sediment from earthworks and/or flow into a surface water body, ephemera watercourse, the coastal marine area, or onto and that may enter a surface water body, ephemera watercourse or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body, ephemera watercourse, or the coastal marine area, including via a stormwater network.	Oppose	WAL does not support an increase in the required setback to 10m. The permitted activity conditions already require, in addition to the setback, a requirement for sediment and erosion control measures to be put in place, which will effectively manage any potential discharges to any waterbody. WAL also does not support the introduction of ephemera watercourse.
Rule WH.R24: Earthworks - restricted discretionary activity.	Wellington Water Ltd S151.100	Amend	Provide an exemption to (b) for RS .	Support	WAL supports the reference to the extent that it addresses the matters raised in WAL's original submission
	Transpower New Zealand Limited	Amend	Amend rule as follows: Rule WH.R24: Earthworks Earthworks and the associated discharge of sediment and/or flow into a surface water body or coastal water, or onto or into and where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23, and the associated discharge of sediment and/or flow into a	Support in part	WAL supports the reference to the extent that it addresses the matters raised in WAL's original submission



Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
			<p><u>surface water body or coastal water, or onto or into and where it may enter a surface water body or coastal water, including via a stormwater network, is a restricted discretionary activity, provided the following conditions are met:</u></p> <p>...</p> <p>and (b) earthworks shall not occur between 1st June and 30th September in any year.</p> <p>Matters for discretion</p> <p>...</p> <p>8. Preparation required for the close-down period (from 1st June to 30th September each year) and any maintenance activities required during this period. Where earthworks will be undertaken within the period from 1 June to 30 September, the matters set out under section G5.0 of the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbance Activities in the Wellington Region (2021)</p> <p>9. Monitoring and reporting requirements</p> <p><u>Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbance Activities in the Wellington Region (2021).</u></p>		
Schedules and Maps					
Schedule F: Ecosystems and habitats with significant biodiversity values.	Environmental Defence Society S222.117 Forest and Bird S261.210	Amend	Consider including additional detail in the soon-to-be published DOC literature review of habitat requirements of native fish species.	Oppose	It is appropriate to seek to include new species from a yet to be published report. A subsequent variation should be advanced, as appropriate, to incorporate such changes.
Map 86: Unplanned greenfield areas – Wellington City Council.	Wellington City Council S33.149	Neutral	Amend boundaries to include all open space zones within the urban boundary.	Support in part	WAL supports the reference to the extent that it addresses the matters raised in WAL's original submission
	Summerset Group Holdings Limited S38.036 Transpower New Zealand Limited S177.081	Oppose	Delete the map.	Support in part	WAL supports the reference to the extent that it addresses the matters raised in WAL's original submission
Definitions / general comments					
General comments – definitions	Wellington Water S151.180	Amend	Define "point source discharge" so that it clearly excludes discharges from wastewater and stormwater networks.	Support	WAL supports this submission, noting that discharges from stormwater networks are generally managed differently to point source discharges.



Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
Po nt Source D scharge			Other re ef as may be requ red to address the ssues dent f ed, nc ud ng re ef that s a ternat ve, add t ona or consequent a .		
Genera comments – def n t ons Commensurate	We ngton Water S151.182	Amend	Add new def n t on as fo ows: <u>Commensurate: n the context of reduct ons n contam nants n wastewater or stormwater d scharges, means a eve of reduct on that s both proport onate to the effect of the d scharge on the rece v ng env ronment, and reasonab y w th n the contro of the app cant.</u>	Support	W AL supports the c ar f cat on prov ded by th s def n t on.
Genera comments – def n t ons Urban Zone	Greater We ngton Reg ona Counc	Amend	nc ude new def n t on as fo ows: Urban zones are the fo ow ng zones as set out n the Nat ona P ann ng standards: <ul style="list-style-type: none"> > <u>Res dent a zones (arge ot res dent a , ow dens ty res dent a , genera res dent a , med um dens ty res dent a , h gh dens ty res dent a)</u> > <u>Commerc a and m xed-use zones (ne ghbourhood centre, oca centre, commerc a , arge format reta , m xed use, town centre, metropo tan centre, c ty centre)</u> > <u>ndustr a zones (ght ndustr a , genera ndustr a , heavy ndustr a)</u> > <u>Spec a purpose zones un ess t can be demonstrated that the spec a purpose zone s a rura zone.</u> 	Oppose	Wh e th s def n t on prov des some c ar ty around what compr ses “unp anned greenf e d deve opment, W AL’s concerns w th respect to the undy onerous requ rements around unp anned urban deve opment rema n unso ved.
Genera comments – def n t ons Earthworks	We ngton Water L m ted S151.005	Oppose	Seeks and exempt on for reg ona y s gn f cant nfrastructure from w nter shutdown works.	Support	W AL supports th s re ef to the extent that t s cons tent w th W AL’s subm ss on seek ng the nc us on of new earthwork prov s ons for reg ona y s gn f cant nfrastructure.
Genera comments – def n t ons Unp anned greenf e d deve opment	We ngton C ty Counc S33.004	Not stated	Concerned about the pract ca mp cat ons and un ntended consequences of unp anned greenf e d deve opment be ng a proh b ted act v ty. Cons ders th s w affect WCC’s ab ty to make strateg c dec s ons on growth and deve opment w thout a change to the D str ct and Reg ona P an, and d ff cu tes w th m nor changes to urban zon ng. Cons ders the proh b ted status has not been reasonab y just f ed, and that a ternat ves that cou d ach eve the strateg c ntent of the ru e w thout requ r ng a dua p an change process, such as a D scret onary Act v ty status, shou d be cons dered.	Support	W AL shares the same concerns as those set out by the subm tter and cons ders the prov s ons re at ng to unp anned greenf e d deve opment requ re a s gn f cant rework and reva uat on under sect on 32 of the RMA.
	Transpower New Zea and L m ted S177.003	Not stated	Def ne the term "greenf e d deve opment", and that th s term must exc ude the operat on, ma ntenance, upgrad ng, or deve opment of reg ona y s gn f cant nfrastructure'.	Support	W AL agrees that the reg ona y s gn f cant nfrastructure must be exc uded from cons derat on n the “unp anned greenf e d deve opment” and “greenf e d deve opment” and cons ders that th s approach ends tse f to a spec f c po cy framework for reg ona y s gn f cant nfrastructure.

Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
General comments – definitions High risk industrial or trade premises	Transpower New Zealand Limited S177.010	Amend	Amend as follows: High risk industrial or trade premises - An industrial or trade premises that stores, uses or generates contaminants or hazardous substances on-site that are exposed to rain and could become entrained in stormwater. Activities that may occur at these premises could include:	Support	WAL supports the removal of the term 'contaminant' and considers this too broad to be used in a definition and could inadvertently capture agricultural and industrial premises, including low risk premises.
General comments – overall	Transpower New Zealand Limited S177.002	Not stated	Ensure that higher order direct on on regional infrastructure continues to be provided for through PC1 which has a so g v ng effect to the NPSFM.	Support	WAL supports consistency in the planning framework for regional infrastructure, as set out by this submitter. In ensuring consistency with the RPS, the framework should have a so g v ng effect to the NZCPS, in addition to the NPSFM.
General comments – stormwater management	Wellington Fish and Game Regional Council S188.012	Not stated	Requirement for demonstrating functional need, and the effects management hierarchy should be included to bring the Plan into alignment with current national directives.	Support in part	WAL supports the intent for a alignment between the NPSFM and the NRP. Notes however that: <ul style="list-style-type: none"> ➢ The NPSFM also includes provisions for specified infrastructure that cannot be overlooked and requires consideration in the NRP; and, ➢ Care needs to be taken to ensure that any potential drafting amendments do not inappropriately conflict the requirements of the NPSFM and NZCPS.
General Comments – Overall	Horokwai Quarries Ltd S002.006	Amend	Amend relevant provisions in the Whaitua Te Awarua-o-Porua (Objectives, Policies and Rules), consistent with the effect sought in submissions on points within this submission.	Support in part	WAL supports the effect to the extent that quarry activities are sufficiently provided for in the NRP. Quarries serve a critical support function to the upgrading and maintenance of regional infrastructure, such as Arports, and this needs to be appropriately recognised in the NRP.
General Comments – Overall	Winstone Aggregates S206.014	Not stated	Seeks specific consent pathway for the continuation of regional infrastructure quarrying activities within the Wellington Region.	Support in part	WAL supports the effect to the extent that quarry activities are sufficiently provided for in the NRP. Quarries serve a critical support function to the upgrading and maintenance of regional infrastructure, such as Arports, and this needs to be appropriately recognised in the NRP.

