

# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)

Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

## Who can make a Further Submission?

A Further Submission may be made by any person who:

- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the [Natural Resources Plan, Plan Change 1](#) and on the [consultation and submission processes](#) please visit our website.

## How to make a Further Submission:

1. You can use the [online submission portal](#); or
2. You can use the Further Submission Form(s) (Form 6).
  - [This Further Submission Form\(s\) \(Form 6\) – Microsoft Word version](#); or
  - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version](#).

Please send the Further Submission Form in by one of the below methods:

- Email it to the [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz).
- Post it to: [PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Advisor](#).
- Drop it off at reception at one of our offices, marked ATT: Hearings Advisor.

Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.

## Further Submission Form requirements:

- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter.  
Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our [website](#). If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
<b>Name of Submitter:</b> (First and last name, or organisation / company)	Wellington City Council
<b>Address for service:</b> (Email, or physical address) Please note an <u>email address</u> is the preferred method	Michael.Duindam@wcc.govt.nz
<b>Phone:</b> (Optional)	
<b>Contact person for submission:</b> (If different to above)	Michael Duindam
<b>I wish to be heard in support of my submission at a hearing:</b>	Yes
<b>I would consider presenting a joint case at the hearing with others who</b>	Yes

make a similar submission:	
<b>2. Criteria applicable to Further Submitter:</b>	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	N/A
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	N/A
C) I am the local authority for the relevant area.	Yes
Specify the reasoning behind why you qualify for either of these above options:	Submitting on behalf of Wellington City Council

<b>3. For the further submitter to action</b>
<p>Service of your further submission:</p> <p>Please note that any person making a further submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</p> <p>Each submitter has an address for service available at: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a>. If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>

<b>4. Disclosures:</b>		
If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation	yes	08/03/2024
<p><b>Public information:</b> Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website. In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a>. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a>.</p>		

<b>5. Further Submission:</b>
<ul style="list-style-type: none"> <li>The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested: <ul style="list-style-type: none"> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Submitter</a></li> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Provision</a></li> </ul> </li> <li>Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.</li> <li>If you are providing suggested text amendments to a provision, please do so in the following format: <ul style="list-style-type: none"> <li>Suggested added text, shown as <b>bolded text</b> format</li> <li>Suggested deleted text, shown as <del>struckthrough</del> format</li> </ul> </li> </ul>

**Please enter further submission points in the table on the following page(s)**

I support/oppose the submission of:	The particular part/s of the submission I support/oppose are:			Original Reasons:	Original Decision Requested:	The reasons for my support/opposition are:	I seek that the whole (or part) of the submission be allowed/disallowed:
	Sub no./point no.	Support/oppose	Provision				
S275 The New Zealand Transport Agency	S275.007	Amend	8.2.1 Discharges to water	<p>Considers it unclear if Policy P.P5 and Policy P.P6 are intended to apply to stormwater network discharge points noting that Policy WH.P6 specifically excludes stormwater networks.</p> <p>Considers that stormwater networks are subject to a range of other controls which would address issues identified in P.P5 and P.P6 so should be specifically excluded from these provisions</p>	<p>Specifically exclude stormwater networks from consideration under WH.P5, P.P5 and P.P6 and related provisions (to be consistent with WH.P6).</p> <p>Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.</p>	Consistent with Wellington City Council's position on the matter.	Allow
S275 The New Zealand Transport Agency	S275.010	Amend	Objective P.O3	<p>While NZTA supports the intent behind the reduction in contaminant loads proposed, it is unclear if and how the reduction can be sustained and further information should be provided before such targets are adopted. The Section 32 assessment states "...the economic costs to communities are likely to be significant due to infrastructure upgrade costs [when compared to 'status quo'] (page 162). It is also noted that cost assessments (page 151 and 152) focus on local authority costs, not NZTA costs which seem to have been omitted. The value of investment/forward planning which has already been made through the consent process under the Operative Plan is also not explicitly recognised in the section 32.</p>	<p>Further consideration of the feasibility and costs of these targets. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.</p>	Consistent with Wellington City Council's position on the matter.	Allow

S275 The New Zealand Transport Agency	S275.019	Oppose	Rule WH.R1:	Considers this rule cannot be complied with as items such as paint and cement are required for the construction and maintenance of structures in the coastal marine area. Considers the prohibited activity status is inflexible and could have unintended consequences as other potentially more harmful substances may have to be used instead.	Delete this rule Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.	Consistent with Wellington City Council's position on the matter.	Allow
S275 The New Zealand Transport Agency	S275.031	Amend	Rule WH.R23	Notes the notified version of this rule contained errors which have now been corrected. Considers the rule also needs to be amended to provide for the ability of some sediment and/or flocculant the stormwater network. Considers a limit of no discharge is unworkable without completely isolating the site from the network and treating all sediment / flocculant discharge to 100% is not feasible.	Amend the rules to provide for some sediment and/or flocculant discharge where appropriate sediment control methods are in place.  Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.	Consistent with Wellington City Council's position on the matter.	Allow
S275 The New Zealand Transport Agency	S275.034	Amend	Rule WH.R23	Notes the notified version of this rule contained errors which have now been corrected. Considers the rule also needs to be amended to provide for the ability of some sediment and/or flocculant the stormwater network. Considers a limit of no discharge is unworkable without completely isolating the site from the network and treating all sediment / flocculant discharge to 100% is not feasible.	Amend the rules to provide for some sediment and/or flocculant discharge where appropriate sediment control methods are in place.  Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.	Consistent with Wellington City Council's position on the matter.	Allow
S275 The New Zealand Transport Agency	S275.042	Amend	Schedule 29: Stormwater Impact Assessme nts.	Suggests Schedule 29 should be prefaced with a statement which reflects Schedule 4 of the RMA "...must be specified in sufficient detail to satisfy the purpose for which it is required"	Add prefacing text which indicates that the Stormwater Impact Assessment should be of a scale which reflects the application to which it relates. For example: A stormwater impact assessment shall include the following analysis in sufficient detail to satisfy the purpose for which it is required: Any further alternative or consequential relief as may be necessary to fully achieve the relief sought	Consistent with Wellington City Council's position on the matter.	Allow

S216 Te Rūnanga o Toa Rangatira (Te Rūnanga)	S216.006	Amend	Rule WH.R13	Considers a non-complying rule is more appropriate to regulate stormwater discharges which may enter a surface water body or coastal water when the land has not been zoned for urban development.	Change to rule WH.R13 to classify the relevant activity as non-complying instead of prohibited.	Consistent with Wellington City Council's position on the matter.	Allow
S216 Te Rūnanga o Toa Rangatira (Te Rūnanga)	S216.008	Amend	Rule WH.R13	Considers a non-complying rule is more appropriate to regulate stormwater discharges which may enter a surface water body or coastal water when the land has not been zoned for urban development.	Change to rule WH.R13 to classify the relevant activity as non-complying instead of prohibited.	Consistent with Wellington City Council's position on the matter.	Allow

<p>S216</p> <p>Te Rūnanga o Toa Rangatira (Te Rūnanga)</p>	<p>S216.005</p>	<p>Amend</p>	<p>Policy WH.P2</p>	<p>Considers the intention of Policy WH.P2(a), Policy WH P.P15 and associated provisions is to restrict urban development that is ad hoc and uncoordinated to minimise water quality impacts, lack of stormwater infrastructure and other environmental effects.</p> <p>Supports a dedicated planning approach to development in the Wellington Region. Considers urban sprawl should be avoided when it results in poor environmental outcomes. Considers there a need to clarify the provisions relating to 'unplanned greenfield development' and the type of activities captured by this rule and the appropriate rule category. Notes that Under the Ngāti Toa Rangatira Deed of Settlement Act 2014, land has been returned or acquired by Ngāti Toa Rangatira under the Right of First Refusal or other processes. These lands may involve historical legacy zones or activities which have been inherited from previous owners or land uses, such as former education and corrections facilities. Considers while new development will aim to achieve high standards of wastewater and stormwater disposal in terms of Water Sensitive Urban Design systems, there could be unanticipated challenges relating to existing (historical) infrastructure, buildings and related additions or alterations that may trigger the unplanned greenfield development rule. Considers similar issues may exist for areas where resource consents have been granted for activities in unplanned greenfield development areas but the zoning has yet to reflect existing activity. For example, upgrades to facilities in rural areas that could trigger the unplanned greenfield development rule. Notes this upgrades may not justify the expense and time of a private plan change process. Considers a strong alignment between the provisions of the district plans and NRP is needed when signalling land that may potentially become part of future urban development areas. For</p>	<p>Clarify the provisions relating to 'unplanned greenfield development' and the type of activities that would be captured by this rule and the appropriate rule category. Submits that the plan change should be amended to provide a more balanced and nuanced approach with regard to managing the tension between restricting urban sprawl and provision for practical flexibility for development in nonurban areas. Amend WH.P2(a) to state: Restricting prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants.</p>	<p>Consistent with Wellington City Council's position on the matter.</p>	<p>Allow</p>
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				<p>example, the NPR maps 86-89 may become 'out of date' due to district plan reviews. Considers this may require a two plan change process (an update to the relevant maps of the NRP and the district plan zoning).</p>			
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<p>S216 Te Rūnanga o Toa Rangatira (Te Rūnanga)</p>	<p>S216.007</p>	<p>Amend</p>	<p>Policy WH.P2</p>	<p>Considers the intention of Policy WH.P2(a), Policy WH P.P15 and associated provisions is to restrict urban development that is ad hoc and uncoordinated to minimise water quality impacts, lack of stormwater infrastructure and other environmental effects.</p> <p>Supports a dedicated planning approach to development in the Wellington Region. Considers urban sprawl should be avoided when it results in poor environmental outcomes. Considers there a need to clarify the provisions relating to 'unplanned greenfield development' and the type of activities captured by this rule and the appropriate rule category. Notes that Under the Ngāti Toa Rangatira Deed of Settlement Act 2014, land has been returned or acquired by Ngāti Toa Rangatira under the Right of First Refusal or other processes. These lands may involve historical legacy zones or activities which have been inherited from previous owners or land uses, such as former education and corrections facilities. Considers while new development will aim to achieve high standards of wastewater and stormwater disposal in terms of Water Sensitive Urban Design systems, there could be unanticipated challenges relating to existing (historical) infrastructure, buildings and related additions or alterations that may trigger the unplanned greenfield development rule. Considers similar issues may exist for areas where resource consents have been granted for activities in unplanned greenfield development areas but the zoning has yet to reflect existing activity. For example, upgrades to facilities in rural areas that could trigger the unplanned greenfield development rule. Notes this upgrades may not justify the expense and time of a private plan change process. Considers a strong alignment between the provisions of the district plans and NRP is needed when signalling land that may potentially become part of future urban development areas. For</p>	<p>Clarify the provisions relating to 'unplanned greenfield development' and the type of activities that would be captured by this rule and the appropriate rule category. Submits that the plan change should be amended to provide a more balanced and nuanced approach with regard to managing the tension between restricting urban sprawl and provision for practical flexibility for development in nonurban areas. Amend WH.P2(a) to state: Restricting prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants.</p>	<p>Consistent with Wellington City Council's position on the matter.</p>	<p>Allow</p>
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				example, the NPR maps 86-89 may become 'out of date' due to district plan reviews. Considers this may require a two plan change process (an update to the relevant maps of the NRP and the district plan zoning).			
S240 Porirua City Council	S240.001	General comments - definitions	Not Stated	Considers a definition of 'urban environment' is required in place of 'urbanised area' in various proposed provisions to provide greater regulatory certainty.	Insert definition for Urban Environment:  Has the same meaning as given in section 1.4 of the National Policy Statement for Urban Development 2020.	Consistent with Wellington City Council's position on the matter.	Allow
S240 Porirua City Council	S240.008	General comments - overall	Not Stated	Considers the PDF format of PC1 and the NRP, with no hyperlinked definitions and with A4 maps in appendices, is out of step with current technology and best practice where plans are presented in digital formats. Considers converting PC1 and the NRP to an eplan format will improve regulatory compliance and reduce costs through time savings for plan users	Request that Greater Wellington convert both the PC1 and the NRP to an eplan format as soon as practicable to enable plan users to efficiently find information	Consistent with Wellington City Council's position on the matter.	Allow

S240 Porirua City Council	S240.016	6 Other methods	Amend	<p>Supports action plans to achieve objectives and considers action plans should be developed in partnership with territorial authorities rather than being informed by them. Working in partnership would reflect the long-term partnership approach taken under the Harbour Strategy and Action Plan between councils and Ngāti Toa. Considers the s32 evaluation of Council feedback on this point at pre-notification consultation has not addressed this concern and does not make sense, as Method M36 seeks to direct a partnership with mana whenua (submitter references paragraph 51 of Part A of the s32 report). Considers Council is a key stakeholder as a regulator, land owner and asset owner and an action plan developed in partnership with Council is more likely to be successful.</p>	<p>Amend the method so that territorial authorities are partners to development and delivery of action plans: Method M36: Freshwater Action Plan programme Wellington Regional Council will implement a programme to prepare, deliver, monitor and review Freshwater Action Plans for all part Freshwater Management Units identified in Schedule 27. Freshwater Action Plans will be:</p> <p>(a) developed in partnership with mana whenua <b>and territorial authorities</b>, and be informed by engagement with catchment communities, <del>territorial authorities</del> and stakeholders, and (b) prepared and published for all Freshwater Management Units and/or part Freshwater Management Units in the Wellington region by December 2026, and (c) prepared for all attributes identified in Schedule 27 A2. Freshwater Action Plans may also be prepared for, or incorporate, actions for any other relevant target attribute state or environmental outcome identified in partnership with mana whenua or with the community. Wellington Regional Council, in partnership with mana whenua <b>and territorial authorities</b>, and informed by engagement with catchment communities, <del>territorial authorities</del> and stakeholders, may make changes or additions to any Freshwater Action Plan, at any time, for the purpose of achieving the target attribute states and/or environmental outcomes set in this Plan.</p>	<p>Consistent with Wellington City Council's position on the matter.</p>	<p>Allow</p>
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S240 Porirua City Council	S240.027	Table 9.1: Coastal water objectives	Amend	<p>Concerned about the 12-14% increased cost per year to ratepayers to meet the 2040 E.coli limit (as stated in the s32 report) on top of BAU rates increases of between 10-30% and the affordability of this for ratepayers. Considers the 2060 target of 6-7% is more achievable provided other funding avenues are explored, including growth charging and debt funding. Notes significant central government funding will also be required. Considers the numbers do not take into account debt affordability and availability with Local Government Funding Agency Covenants. Considers that repairing the public network would only reduce a proportion of the contaminant load and there are known issues with private laterals that make up half the network by length and a significant portion of untreated discharges to land and water. Notes costs that would fall on landowners to upgrade pipes within the private network are not figured into the s32 Evaluation, and these investments would be substantial to meet the 2040 target. Considers laterals on private property are the responsibility of the landowner, and they must bear the costs to fix them when faulty rather than the ratepayer. Concerned about the practical administrative issues of Council undertaking the work, or funding it upfront with cost recovery. Considers costs to address these issues could be between \$10,000 to \$20,000 per property or more with Wellington Water's high level indicative estimates between \$250 - 350 million. Considers the impact of the above funding requirements on housing and business development capacity is not sufficiently explored in the s32 Evaluation.</p>	Amend the timeframe for target states for E.coli and enterococci coastal water objectives to 2060.	Consistent with Wellington City Council's position on the matter.	Allow
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S240 Porirua City Council	S240.031	Table 9.2: Target attribute states for rivers	Amend	<p>Concerned about the 12-14% increased cost per year to ratepayers to meet the 2040 E.coli limit (as stated in the s32 report) on top of BAU rates increases of between 10-30% and the affordability of this for ratepayers. Considers the 2060 target of 6-7% is more achievable provided other funding avenues are explored, including growth charging and debt funding. Notes significant central government funding will also be required. Considers the numbers do not take into account debt affordability and availability with Local Government Funding Agency Covenants. Considers that repairing the public network would only reduce a proportion of the contaminant load and there are known issues with private laterals that make up half the network by length and a significant portion of untreated discharges to land and water. Notes costs that would fall on landowners to upgrade pipes within the private network are not figured into the s32 Evaluation, and these investments would be substantial to meet the 2040 target. Considers laterals on private property are the responsibility of the landowner, and they must bear the costs to fix them when faulty rather than the ratepayer. Concerned about the practical administrative issues of Council undertaking the work, or funding it upfront with cost recovery. Considers costs to address these issues could be between \$10,000 to \$20,000 per property or more with Wellington Water's high level indicative estimates between \$250 - 350 million. Considers the impact of the above funding requirements on housing and business development capacity is not sufficiently explored in the s32 Evaluation.</p>	Amend the timeframe for target states for E.coli and enterococci coastal water objectives to 2060.	Consistent with Wellington City Council's position on the matter.	Allow
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S240 Porirua City Council	S240.046	Policy P.P15	Oppose	Considers there is an insufficient evidence base to support the approach being taken, especially considering that there is a prohibited activity status associated with new unplanned greenfield development. Considers that a consenting pathway is required through a non-complying activity status to avoid any unintended consequences that may result through taking a prohibited approach. Considers this policy directly duplicates P.P2(a) and is therefore unnecessary.	Delete Policy P.P15	Consistent with Wellington City Council's position on the matter.	Allow
S240 Porirua City Council	S240.074	Rule P.R16	Amend	Supports in principle the reduction of sediment discharges from forestry but considers there is a need to provide for the creation of firebreaks as a permitted activity to allow people to defend their homes and property from the risk of wildfires.	Rule P.R16: Vegetation clearance on highest erosion risk land - permitted activity Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a surface water body is a permitted activity provided the following conditions are met: (a) the vegetation clearance is: (i) to implement an action in the erosion risk treatment plan for the farm, or (ii) for the control of pest plants, or (iii) for the creation or maintenance of a firebreak; and (b) debris from the vegetation clearance is not placed where it can enter a surface water body.	Consistent with Wellington City Council's position on the matter.	Allow

S151 Wellington Water Ltd	S151.001	General comments - stormwater management	Amend	Concerned the PC1 policies and rules are not sufficiently enabling, and in some instances are not feasible to implement.	Amend policies and rules to: Clearly provide for stormwater and wastewater discharges from local authority networks as a restricted discretionary activity, without this status being jeopardised by subjective assessments of the merits of the SMS or WNCIS, or noncomplying activity rules in other parts of the NRP. Provide guidance on the matters to be considered in prioritising sub-catchments for improvement works, while also ensuring sufficient flexibility to take account of practical matters such as investment availability and efficiencies and alignment with other workstreams (including wastewater improvement works). Allow matters of detail to be specified in sub-catchment SMPs and SIPs, rather than in the initial SMS and WNCIS. Provide flexibility for determining the load reductions required in order to appropriately contribute to meeting the TAS (in light of our present concerns with the TAS, lack of information as to baseline states in many cases, and the uncertainty around the 'commensurate reduction' wording and whether this is realistic (i.e. properly within Wellington Water's control) for all attributes). Provide for dry weather discharges (such as dry weather overflows and exfiltration) to be managed via a 'responsive management approach' rather than with reference to the TAS (due to the current inability to forecast dry weather overflows or assess the correlation between dry weather discharges within the control of Wellington Water and TAS being achieved). Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Consistent with Wellington City Council's position on the matter.	Allow
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S151 Wellington Water Ltd	S151.003	General comments - target attribute states	Oppose	<p>Opposes the provisions relating to TAS and Coastal Water Objectives (CWO) in full. Considers there is a general lack of information relating to the baseline state to measure against, meaning it is not possible to determine whether the TAS parameters and requirements are reasonable, appropriate and achievable. Considers the CWO in Table 8.1 are generally appropriate parameters for coastal environmental health, but concerned the lack of information relating to baseline states and timeframes to meet requirements makes it difficult to determine whether improvement is measurable. Considers it is unclear how the TAS and CWO provisions will be assessed and measured. Considers the provisions do not currently recognise the complexities and contributing factors for achieving TAS and that meeting TAS for network discharges cannot wholly sit with Wellington Water as there are many factors within catchments that contribute to water quality, and the provisions do not reflect the magnitude of work involved in delivering water quality improvement. Considers the uncertainty and lack of information in the provisions regarding the baseline state means that Wellington Water cannot undertake a full assessment of the potential impact that the TAS/CWO provisions will have on their discharge consent applications and the prioritisation and implementation of sub-catchment improvements. Considers it is likely that the TAS 2040 timeframe (particularly as it relates to E. coli), will result in the requirement for a large proportion of subcatchments (or possibly all of them) to be upgraded in the short term. As such, undertaking a prioritisation exercise and implementing the subcatchment management plans for stormwater and wastewater could be rendered meaningless. This is unlikely to allow for progressive improvement, or for practicable implementation. Seeks further discussions with Greater Wellington on this matter,</p>	<p>The plan change include guidance or provisions that outline how proportional contribution to meeting the TAS can be demonstrated, and more realistic timeframes in the relevant TAS tables. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.</p>	<p>Consistent with Wellington City Council's position on the matter.</p>	Allow
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				particularly around a more detailed assessment of the implications of the TAS and CWO provisions on a sub-catchment basis and a clear understanding of how these would be addressed in a resource consent application.			
S151 Wellington Water Ltd	S151.004	General comments - target attribute states	Oppose	Considers the scale and volume of work necessary between now and 2040 to achieve the necessary reduction in wet weather wastewater overflows, dry weather wastewater discharges and stormwater contamination is significant. Retrofitting the urban areas of four cities to also address environmental outcomes will take decades of planning, designing and construction. Acknowledges this work needs to be done but 17 years (between now and 2040) is insufficient to achieve this. Considers that delivery of the network discharges programme at such a fast pace will impact on delivery of other important work programmes for Te Mana o te Wai such as storage lakes for drinking water supply to support increased minimum flows, wastewater treatment plant upgrades and the renewals programmes for both wastewater and water supply.	Amend all timeframes associated with TAS from 2040 to 2060. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Consistent with Wellington City Council's position on the matter.	Allow

S151 Wellington Water Ltd	S151 Wellington Water Ltd	General comments - stormwater management	Amend	<p>Supports the recognition of the role of modelling in PC1 as an analytical tool, including to assess the performance of the wastewater and stormwater networks and compliance with associated consent requirements. Considers PC1 will require Wellington Water to undertake significantly more modelling than it already does which in some cases will be onerous with no additional benefit in predicting load reductions or E. coli reductions. Notes Schedule 32 appears to require the full wastewater network to be modelled as part of preparing the WNCIS but considers this will not improve the understanding of overflows beyond that provided by the current 'Strategic Model'. Concerned requiring SMS be guided by modelling and monitoring will place an unreasonably high burden on consent holders. Considers that any receiving environment modelling should be undertaken by Greater Wellington, including state of the environment modelling which is required to ascertain the baseline state for identified attributes. Notes PC1 repeatedly refers to modelling of load as well as concentration of contaminants (WH.P19 and P.P18 )but concentration cannot be easily or accurately modelled, and would not provide valuable insight. Considers the focus should be on modelling and managing contaminant load, not concentrations. Notes Wellington Water can undertake modelling for contaminant loads and is looking into models such as the 'Contaminant Load Model' (CLM) and 'Medusa' for that purpose, but ascertaining the load reductions necessary to achieve (or contribute to achieving) the TAS will also require the use of receiving environment models such as the 'Fresh Water Management Tool' (FWMT), which is a project that should be undertaken by Greater Wellington. Notes Wellington Water is also not able to model E. coli or enterococci concentrations or load, and instead must use</p>	<p>PC1 be amended to remove unnecessary modelling requirements which are currently to be undertaken by the consent holder; Greater Wellington be responsible for all state of the environment modelling; and Reference to modelling 'concentrations' are removed. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequentia</p>	<p>Consistent with Wellington City Council's position on the matter.</p>	<p>Allow</p>
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				the wet weather discharge frequency as a proxy for this.			
S151 Wellington Water Ltd	S151.021	High risk industrial or trade premise	Amend	Notes discharges from these premises are excluded from the local authority stormwater network rules (WH.R9 and P.R8) and seeks changed to better align with Wellington Water's areas of control.	Amend this definition or add a note to ensure it includes: 1) sites in relation to which the relevant stormwater discharge consents have not been granted and/or applied for, and 2) sites that have been used for the listed purposes in the past, and still generate contaminants in stormwater, but which are not currently used for any of those purposes Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Consistent with Wellington City Council's position on the matter.	Allow
S151 Wellington Water Ltd	S151.025	Stormwater catchment or subcatchment	Amend	Considers the definition is confusing as it is not clear whether the definition includes (or should expressly include) areas where stormwater is discharged to land or groundwater or what 'in the same vicinity' means. Questions whether reference to maps would be more effective.	Revise the definition for clarity. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Consistent with Wellington City Council's position on the matter.	Allow

S151 Wellington Water Ltd	S151.056	Objective WH.O3	Oppose	<p>Seeks the timeframe be altered to 2060 as the 2040 timeframe will render prioritisation of subcatchments for improvement or upgrade meaningless and 17 years is considered insufficient to achieve required outcomes. Considers the CWO contained in Table 8.1 are generally appropriate parameters for coastal environmental health, but notes the lack of information relating to baseline states for Coastal Water Management Units and timeframes to meet the requirements makes it difficult to determine whether improvement can be measured (refer also Section A of submission). In clause (b) 'high contaminant concentrations' should be better defined to clarify the work involved and when this clause is relevant. Considers where improvement is required for the Coastal Water Objectives, the requirement should be that the Objective has been achieved or meaningful progress has been made - similar to clause WH.O2(a). Considers clauses (g) and (h) need to be combined or better distinguished.</p>	<p>Provide further detail in relation to the baseline states and required timeframes in both this objective and Table 8.1. Provide maps showing locations of high contaminant concentrations. Amend objective to provide this further detail. In addition to the above, amend as follows: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained, or improved or meaningful progress has been made towards improvement to achieve the coastal water objectives set out in Table 8.1, and by 2040 2060. Define 'high contaminant concentrations' in clause (b) Combine or better distinguish clauses (g) and (h) Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.</p>	<p>Consistent with Wellington City Council's position on the matter.</p>	Allow
S151 Wellington Water Ltd	S151.059	Objective WH.O9	Amend	<p>Refers to Section A of submission for additional context regarding prioritisation and target attribute states, and comments on Table 8.4. Considers Clause (a) needs to refer to 'meaningful progress' as specified by WH.O2(a). Considers Clause (d) Huangā needs to refer to Schedule B to provide certainty for applicants and notes there appears to be a typo .</p>	<p>Revise clause (a) as follows: 'where a target attribute state in Table 8.4 is not met, the state of that attribute is improved in all rivers and river reaches in the part Freshwater Management Unit so that the target attribute state is met within the timeframe indicated within Table 8.4, or meaningful progress has been made and' Link huangā with Schedule B and improve wording. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.</p>	<p>Consistent with Wellington City Council's position on the matter.</p>	Allow

S151 Wellington Water Ltd	S151.080	Policy WH.P10	Amend	Notes that for clause (a), 'maximise' already has a practicability component to it in the definitions.	Amend policy as follows: (a) using source control to minimise contaminants in the stormwater discharge and maximise, to the extent practicable, the removal of contaminants from stormwater, including through the use of water sensitive urban design measures, and  Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Consistent with Wellington City Council's position on the matter.	Allow
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S151 Wellington Water Ltd	S151.082	Policy WH.P13	Amend	<p>Refers to overarching Section A of submission, particularly in relation to prioritisation, TAS, modelling and monitoring. Supports the focus on copper and zinc in clause (a) Considers the reference to concentrations in clause (b) should be deleted.</p> <p>Considers the range of target attribute states in clause (c) is too wide and creates uncertainty. Considers clause (e) should focus on modelling to determine the necessary copper and zinc load reduction in stormwater discharges Opposes the stormwater network modelling component of clause (e), noting WWL will not model the network in its entirety ahead of starting work on subcatchments. Seeks the deletion of reference to concentrations. States there is no point running a CLM model after implementation because it will provide the same information as preimplementation. Opposes the requirement in (e) to monitor concentrations in network discharge as concentrations are more relevant for receiving waters and loads are more appropriate for network discharges. Considers it unclear how the prioritisation component of (e) will align with clause (f). Considers the prioritisation in Clause (f) is meaningless and it is unclear how clauses (e) and (f) would interact. Notes the plan uses different terms that mean the same thing and it is unclear whether these terms are intended to be applied in the same way, for example, in this policy: (i) 'Contribute to' (ii) 'Supporting the achievement of' Considers the policy should be specific regarding which Target Attribute States need to be addressed by the SMS and so seeks clause (c) be deleted.</p>	<p>Amend policy as follows: Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy Stormwater discharges from local authority and state highway networks shall be managed by: (a) reducing the copper and zinc loads in discharges to coastal water management units to contribute to meeting the coastal water objectives to maintain or improve, and (b) reducing the concentration and contaminant loads of copper and zinc from discharges to surface water bodies in order to maintain, and in degraded part Freshwater Management Units improve, the water quality state for dissolved copper and zinc to contribute to meeting the target attribute states in those part Freshwater Management Units, and (c) supporting the achievement of any other relevant target attribute states or coastal water objectives including for ecosystem health, nutrients, visual clarity and Escherichia coli or enterococci, and (d) implementing a stormwater management strategy and stormwater management plans prepared in accordance with the information and requirements set out in Schedule 31 (stormwater strategy - whitua), and (e) monitoring and modelling the stormwater network to identify catchments to be prioritised, the copper and zinc concentrations and loads in the discharge, and changes in discharge volume and quality over time following improvements in the network infrastructure, and (f) prioritising the reduction, removal, and/or treatment of stormwater discharges to Schedule A (outstanding water bodies) or Schedule C (mana whenua) sites, or mahinga kai. Stormwater discharges from local authority and state highway networks shall be managed by: (a) reducing the copper and zinc loads in discharges to coastal water management units to contribute to meeting the coastal water objectives to maintain or improve, and (b) reducing the contaminant loads of copper and zinc from discharges to</p>	<p>Consistent with Wellington City Council's position on the matter.</p>	<p>Allow</p>
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					<p>surface water bodies in order to maintain, and in degraded part Freshwater Management Units improve, the water quality state for dissolved copper and zinc to contribute to meeting the target attribute states in those part Freshwater Management Units, and (c) supporting the achievement of relevant target attribute states or coastal water objectives for nutrients and E. coli or enterococci, and (d) implementing a stormwater management strategy and stormwater management plans prepared in accordance with the information and requirements set out in Schedule 31 (stormwater strategy - whitua), and (e) modelling the copper and zinc loads in the discharge, and (f) in order to implement the objectives and policies of the Regional Plan, prioritising the improvement of discharges in stormwater subcatchments using a methodology to be set out in a Stormwater Management Strategy prepared in accordance with Schedule 31, that will include engagement with mana whenua and take into account: i. Schedule A (outstanding water bodies) ii. Schedule C (sites with significant mana whenua values) iii. Schedule F (Ecosystems and habitats with significant indigenous biodiversity) iv. Schedule H (contact recreation and Māori customary use) v. Map 85 (Primary contact sites - Te Whanganuia-tara) vi. impacts on group drinking water supplies or community drinking water supplies vii. efficiency and alignment with other work programmes, including work in accordance with a wastewater network catchment improvement strategy or sub-catchment improvement plan; viii. investment availability ix. public health effects x. modelling results xi. effects on the environment.</p>	
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					Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.		
S151 Wellington Water Ltd	S151.086	Policy WH.P18	Oppose	Considers the purpose of policy is unclear and it implies that wastewater networks are the only source of e coli. Refers to comments on prioritisation in Section A of submission.	Delete Policy  Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Consistent with Wellington City Council's position on the matter.	Allow
S151 Wellington Water Ltd	S151.090	Rule WH.R1	Amend	Supports the intent of this rule and associated policy but concerned about how it may impact on stormwater and wastewater discharges.	Add new clause to the end of the existing rule as follows:... Noting that this rule does not apply to the discharge of contaminants collected as part of stormwater management as a result of precipitation or part of the operation of the wastewater network.  OR as alternative relief, define "point source discharge" so as to exclude discharges from the stormwater wastewater networks  Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Consistent with Wellington City Council's position on the matter.	Allow

S151 Wellington Water Ltd	S151.103	Objective P.O3		<p>Considers CWO contained in Table 9.1 are generally appropriate parameters for coastal environmental health but the lack of information relating to baseline states for Coastal Water Management Units and timeframes to meet the requirements makes it difficult to determine whether improvement can be measured. Unclear how 'maintain or improve' operates for the objectives that don't have a value. Suggests timeframe should refer to 2060 because many ecosystems or habitats will take a long time to recover. 2040 doesn't allow for that recovery time. Refer to Section A of submission regarding Target Attribute States, prioritisation and deliverability. i Suggests the wording 'meaningful progress' would be more appropriate.</p>	<p>Provide further detail in relation to the baseline states and required timeframes in both this objective and Table 8.1. Provide maps showing locations of high contaminant concentrations and amend objective to provide this further detail. In addition to the above, amend as follows: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained, or meaningful progress has been made towards improvement or improved to achieve the coastal water objectives set out in Table 8.1, and by 2040 2060. Better define 'high contaminant concentrations' in clause (b) Combine or better distinguish clauses (g) and (h) Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.</p>	<p>Consistent with Wellington City Council's position on the matter.</p>	<p>Allow</p>
S151 Wellington Water Ltd	S151.106	Objective P.O6	Amend	<p>Considers clause (a) needs to refer to 'meaningful progress' to reflect the reality of how long it will take to deliver improvements and for ecosystems to recover. Refers to submission points on prioritisation, Target Attribute State, and deliverability in Section A of submission, and submission points on Table 9.2 and submission points on Table 8.4. Suggests in clause (d), Huanga needs to refer to Schedule B to provide certainty for applicants</p>	<p>Revise Clause (a) as follows: 'where a target attribute state in Table 9.2 is not met, the state of that attribute is improved in all rivers and river reaches in the part Freshwater Management Unit so that the target attribute state is met within the timeframe indicated within Table 9.2, or meaningful progress has been made, and'</p> <p>Link huanga with Schedule B. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.</p>	<p>Consistent with Wellington City Council's position on the matter.</p>	<p>Allow</p>

S151 Wellington Water Ltd	S151.116	Policy P.P12	Amend	<p>Supports the focus on copper and zinc in clause (a). Seeks the deletion of the reference to concentrations in clause (c). Considers the range of target attribute states in clause (d) is too wide and creates uncertainty. Opposes the stormwater network modelling component of clause (e), noting WWL will not model the network in its entirety ahead of starting work on subcatchments, and oppose the requirement to monitor concentrations in discharges, considers concentrations more relevant for receiving waters, and loads appropriate for discharges. Considers clause (f) should focus on modelling to determine the necessary copper and zinc load reduction in stormwater discharges and considers there is no point running a CLM model after implementation because it will provide the same information as pre-implementation. Considers the plan sets many different priorities in different provisions making the prioritisation in clause (g) meaningless and it is unclear how clauses (f) and (g) would interact. Notes the plan uses different terms that mean the same thing and it is unclear whether these terms are intended to be applied in the same way, for example, in this policy: (i) 'Contribute to' (ii) 'Supporting the achievement of' Refers to overarching Section A of submission, particularly in relation to prioritisation, TAS, modelling and monitoring</p>	<p>Amend policy as follows:</p> <p>Policy P.P12: Managing stormwater network discharges through a Stormwater Management Strategy</p> <p>Stormwater discharges from local authority and state highway networks shall be managed by: (a) reducing the copper and zinc loads in discharges to the coastal water management units of Onepoto Arm and Pāuatahanui Inlet in Map 82 and the harbour arm catchments in Map 84 by 15% for copper and 40% for zinc to contribute to meeting the target attribute states and coastal water objectives for copper and zinc in the Onepoto Arm and Pāuatahanui Inlet of Te Awarua-o-Porirua, and (b) reducing the copper and zinc loads in discharges to the Open Coast coastal water management units to contribute to meeting the coastal water objectives to maintain or improve, and (c) reducing the concentration and contaminant loads of copper and zinc from discharges to surface water bodies in order to maintain, and in degraded part Freshwater Management Units improve, the water quality state for dissolved copper and zinc to contribute to meeting the target attribute states in those part Freshwater Management Units, and (d) supporting the achievement of any other relevant target attribute states or coastal water objectives including for ecosystem health, nutrients, visual clarity and Escherichia coli or enterococci, and (e) implementing a stormwater management strategy and stormwater management plans prepared in accordance with the information and requirements set out in Schedule 31 (stormwater strategy - whaitua), and (f) monitoring and modelling the stormwater network to identify catchments to be prioritised, the copper and zinc concentrations and loads in the discharge, and changes in discharge volume and quality over time following improvements in the network</p>	<p>Consistent with Wellington City Council's position on the matter.</p>	<p>Allow</p>
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					<p>infrastructure, and (g) prioritising the reduction, removal, and/or treatment of stormwater discharges to Schedule A (outstanding water bodies) or Schedule C (mana whenua) sites, or mahinga kai.</p> <p>Stormwater discharges from local authority and state highway networks shall be managed by: (a) reducing the copper and zinc loads in discharges to the coastal water management units of Onepoto Arm and Pāuatahanui Inlet in Map 82 and the harbour arm catchments in Map 84 by 15% for copper and 40% for zinc to contribute to meeting the target attribute states and coastal water objectives for copper and zinc in the Onepoto Arm and Pāuatahanui Inlet of Te Awarua-oPorirua, and (b) reducing the copper and zinc loads in discharges to the Open Coast coastal water management units to contribute to meeting the coastal water objectives to maintain or improve, and (c) reducing the contaminant loads of copper and zinc from discharges to surface water bodies in order to maintain, and in degraded part Freshwater Management Units improve, the water quality state for dissolved copper and zinc to contribute to meeting the target attribute states in those part Freshwater Management Units, and (d) supporting the achievement of relevant target attribute states or coastal water objectives for nutrients and E. coli or enterococci, and (e) implementing a stormwater management strategy and stormwater management plans prepared in accordance with the information and requirements set out in Schedule 31 (stormwater strategy - whitua), and (f) modelling the copper and zinc loads in the discharge, and (g) in order to implement the objectives and policies, prioritising the improvement of discharges in stormwater sub-catchments using a methodology to be set out in a Stormwater Management Strategy prepared in accordance with Schedule 31, that will include engagement with mana whenua and take into account: i. Schedule A</p>		
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					(outstanding water bodies) ii. Schedule C (sites with significant mana whenua values) iii. Schedule F (Ecosystems and habitats with significant indigenous biodiversity) iv. Schedule H (contact recreation and Māori customary use) v. Map 85 (Primary contact sites - Te Whanganuia-tara) vi. impacts on group drinking water supplies or community drinking water supplies vii. efficiency and alignment with other work programmes including work in accordance with a wastewater network catchment improvement strategy or sub-catchment improvement plan viii. investment availability ix. public health effects x. modelling results xi. effects on the environment.  Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.		
S151 Wellington Water Ltd	S151.130	Rule P.R22	Amend	Notes earthworks activities undertaken by Wellington Water with minor effects would be unable to meet the permitted activity conditions of proposed Rule WH.R22 including minor repairs and maintenance of three waters infrastructure. Notes that this proposed rule may mean that hundreds of resource consent applications would be required per annum for minor earthworks activities associated with burst pipe repairs.	Amend Rule to reinstate the exemptions for certain earthworks activities as exist for 'other Whaitua', including for the thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines. Any consequential amendments, to other relevant provisions, which are in general accordance with this request.	Consistent with Wellington City Council's position on the matter.	Allow
S151 Wellington Water Ltd	S151.142	Schedule 31	Amend	Clause 9: Considers community engagement is too onerous and should not be a requirement.	Delete reference to 'community' from clause 9. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Inconsistent with Wellington City Council's position on the matter	Disallow
S225 Upper Hutt City Council	S225.004	General comments - consultation	Not Stated	Not stated	Seek further work and consultation is undertaken in partnership with territorial authorities to accurately reflect roles and function in achieving outcomes and aspirations of Whaitua documents;	Consistent with Wellington City Council's position on the matter	Allow

S225 Upper Hutt City Council	S225.013	General comments - overall	Not stated	Not stated	Amend timeframes in NRP to give reasonable timeframes to implement new direction for landowners, ensure these are reasonable and achievable and where practicable, funded from external sources;	Consistent with Wellington City Council's position on the matter	Allow
S225 Upper Hutt City Council	S225.014	General comments - urban development	Not stated	Not stated	Delete provisions prohibiting urban expansion beyond existing urban zoned land, particularly where this does not align with recent rezoning notified before this plan change;	Consistent with Wellington City Council's position on the matter	Allow
S225 Upper Hutt City Council	S225.015	General comments - stormwater management	Oppose	Not stated	Delete or significantly amend hydrological controls for all development, which are going beyond hydraulic neutrality, as these are unclear and seem to be overly onerous;	Consistent with Wellington City Council's position on the matter	Allow
S225 Upper Hutt City Council	S225.021	General comments - overall	Amend	Not stated	Seek amendment to delete references to Wellington Water throughout plan change and refer instead to water entities.	Consistent with Wellington City Council's position on the matter	Allow
S225 Upper Hutt City Council	S225.041	Redevelopment	Oppose	Concerned about implications definition may have on business-as-usual activities undertaken by territorial authorities and infrastructure providers. Concerned inclusion of existing roads and 'replacement' or 'reconstruction' is overly onerous given end state of the environment and effects remaining the same. Considers it egregious to require 'like for like' replacements and renewals, which are often required for ongoing function of public goods, to be considered in the same vein as full redevelopments of brownfield sites.	Seek that more than minor maintenance and renewals activities are a permitted or controlled activity and this is effectively reflected in definition of redevelopment.	Consistent with Wellington City Council's position on the matter	Allow

S225 Upper Hutt City Council	S225.058	6. Other methods	Amend	Concerned that this is unclear if territorial authorities are being consulted on funding opportunities or expected to financially contribute.	Amend for clarity noting that territorial authority's already have stretched budgets that are unlikely to be able to fund works not already anticipated in the long term plan processes.	Consistent with Wellington City Council's position on the matter	Allow
S225 Upper Hutt City Council	S225.067	Policy WH.P2	Oppose	Opposes prohibition of development, as it limits options to give effect to NPS-UD and overrides District Plan changes and reviews currently underway or proposed in future. Considers greenfield development has more opportunity to address effects, particularly given space available to incorporate design and infrastructure solutions when compared to constrained urban environments. Notes prohibition in policy, and direction in objective above it, would render a future plan change an impossibility as it wouldn't implement higher order documents. Considers the section 32 analysis would need to consider provisions PC1 and recent changes to NRP and therefore would be at risk of being contrary to objectives and policies in these plans.	Seek that the policy is amended to read: ... "(a) <del>prohibiting</del> <b>managing</b> unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and"	Consistent with Wellington City Council's position on the matter	Allow
S225 Upper Hutt City Council	S225.076	Policy WH.P13	Amend	Supports intent to improve water quality through managing stormwater contaminants, however, considers cost implication of policy needs to be funded	Retain as notified except seek that "and/or" used throughout this document be amended to clarify whether it is inclusive or not as and/or is inappropriate. Support councils with funding.	Consistent with Wellington City Council's position on the matter	Allow

S225 Upper Hutt City Council	S225.081	Policy WH.P19	Amend	Supports intent, but is concerned the cost will fall on ratepayers. Considers this requires significant thought and consultation with territorial authorities and their communities around costs. Considers lack of clarity in provision and others throughout PC1 fails to follow basic section 32 processes in development of PC1, which require identification of implications of provisions, a thorough cost and benefit analysis of provisions, and whether these are the more appropriate provisions to achieve outcomes, including an identification of who would be responsible for the implementation of requirements and the implications on those parties	Seek that consultation is undertaken with territorial authorities and their communities, and that the timeframes are realistic and achievable within the resource constraints of Councils and their communities. Seek that and/or used throughout this document be amended to clarify whether it is inclusive or not as and/or is inappropriate.	Consistent with Wellington City Council's position on the matter	Allow
S225 Upper Hutt City Council	S225.091	Policy WH.P29	Amend	Considers these are all reasonable things to include as conditions of consents for larger projects, but may not be reasonable for small scale projects such as the maintenance of driveways and footpaths, which are now considered earthworks, in accordance with amended definition.	Amend to clearly identify scale or threshold this policy should apply at.	Consistent with Wellington City Council's position on the matter	Allow
S225 Upper Hutt City Council	S225.094	Rule WH.R1	Oppose	Concerned with: - lack of thresholds or scope of rule application - lack of specificity - some vehicle cleaning products are biodegradable and less harmful to the environment than others - fundamental inability to monitor against this rule - some of these in small quantities may be suitable for discharging to land, e.g. biodegradable cleaning products, cooking oil. As written, means that washing any car or washing house windows or walls would be a prohibited activity. Should a car fail, such as a boiled radiator or oil leak, this would also be a prohibited activity. Considers prohibited activities need to be clear and measurable without any need for interpretations and appears this rule has not been fully considered - particularly as to its purpose, applicability and practical (and reasonable) implementation.	Delete or significantly rewrite to a more specific and reasonable approach. If a rule like this is retained, seek a more permissive activity status such as restricted discretionary. However, we note that it is impractical to require consent for these small scale activities, such as washing windows. If retained, this rule needs further consideration.	Consistent with Wellington City Council's position on the matter	Allow

S225 Upper Hutt City Council	S225.104	Rule WH.R13	Oppose	Concerns with the implications and practicality of this rule and identifies that prohibition in policy, and the direction in objective above it, would effectively render a future plan change an impossibility because it would not be implementing higher order documents. Section 32 analysis for such a plan change would need to consider provisions in PC1 and recent changes to NRP and therefore would be at risk of being contrary to objectives and policies in these plans.	Delete rule or amend significantly to change from prohibited and provide a consenting pathway for unplanned greenfield developments. Seek this specifically should not apply to developments feeding into existing stormwater networks that will have an existing stormwater network discharge consent.	Consistent with Wellington City Council's position on the matter	Allow
S225 Upper Hutt City Council	S225.107	Rule WH.R23	Oppose	Concerns with implications of amending earthworks definition, and implications for this rule. Considers clause 16 changes to the provision significantly improve outcomes for landowners and public, but submitter remains of the opinion the removal of exclusions from definitions of earthworks, significantly affect submitters ability to undertake business as usual maintenance and renewals particularly for local authority roads, footpaths and cycle paths. Considers it more appropriate to include these activities as permitted activities, given their effects are well understood, and can be managed by permitted activity standards	Amend provisions to address the following key functions of territorial authorities as road controlling authorities: 1. need to cover road maintenance and upgrading, including reseal 2. upgrading of underground networks 3. replacement of signs and traffic/speed management 4. repair, maintenance and upgrading of pedestrian and cycle facilities  Seek that and/or used throughout this document be amended to clarify whether it is inclusive or not as and/or is inappropriate.	Consistent with Wellington City Council's position on the matter	Allow
S286 Taranaki Whānui	S286.002	General comments - definitions	Not stated	Seeks a definition of papakāinga is required as consequential amendment to provide for relief sought in relation to enabling papakāinga activities.	Add definition for Papakāinga: <b>Any activity undertaken in the traditional rohe of tangata whenua to sustain themselves, which is on land held under Te Ture Whenua Māori Act 1993, or on land where there is an ancestral connection to the land and the land will remain in Māori ownership in the long term. Papakāinga includes residential activities and commercial activities that provide employment and / or income to support those living in the papakāinga as well as (but not be limited to): social, cultural, economic, conservation and recreation activities, marae, wāhi tapu and urupā.</b>	Consistent with Wellington City Council's position on the matter	Allow

S286 Taranaki Whānui	S286.004	General comments – unplanned greenfield development	Not stated	Concerns unplanned greenfield areas and associated provisions will impose significant costs and impact ability of Taranaki Whānui whānau to develop ancestral lands. Notes land not yet returned to Māori ownership through treaty settlements, includes many sites in areas mapped as "unplanned greenfield land" including rural and open space land. Considers prohibition on developing these lands inconsistent with principles of Te Tiriti.	Freshwater effects of development of these sites are addressed through a regional consent process rather than a regional plan change	Consistent with Wellington City Council's position on the matter	Allow
S286 Taranaki Whānui	S286.005	General comments - overall	Not stated	Concerned additional rules for stormwater management would create additional barriers to develop land for long-term benefit of Taranaki Whānui uri through Papakāinga.	Not stated	Consistent with Wellington City Council's position on the matter	Allow
S286 Taranaki Whānui	S286.062	Policy WH.P31	Amend	Supports intent to avoid winter earthworks, but considers this issue can be addressed through consent conditions on an earthworks consent rather than requiring a separate consent.	Delete policy: Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).	Consistent with Wellington City Council's position on the matter	Allow

S286 Taranaki Whānui	S286.077	Rule WH.R13	Oppose	Concerned policy and provisions will impose significant costs and impact the ability of Taranaki Whānui whanau to develop their ancestral lands. Notes land not yet returned to Māori ownership through treaty settlements, includes many sites in areas mapped as "unplanned greenfield land" including rural and open space land. Considers prohibition on developing these lands inconsistent with principles of Te Tiriti and inconsistent with need to provide for broader housing affordability and innovation on both Māori and all other land. Considers planning processes need to be flexible to ensure aspirational outcomes are achieved. Seeks freshwater effects of development of these sites are addressed through a regional consent process rather than a regional plan change	Delete rule.	Consistent with Wellington City Council's position on the matter	Allow
S211 Hutt City Council	S211.003	General comments - target attribute states	Amend	Considers repair and upgrading the public network would only reduce a proportion of the contaminant load and there will be substantial costs to landowners to upgrade pipes (private laterals) within the private wastewater network that make a significant portion of untreated discharges to land and water, to meet the proposed 2040 target. Notes Wellington Water's concern in relation to the ability to deliver the work required to meet the 2040 target.	Amend the proposed 2040 E.coli target timeframe to 2060	Consistent with Wellington City Council's position on the matter	Allow
S211 Hutt City Council	S211.005	General comments - urban development	Not Stated	Considers that the proposed prohibited activity status for unplanned greenfield development is inconsistent with Policy 8 of the NPS-UD, could prevent HCC from meeting its ongoing requirements under the NPS-UD, and precludes consenting pathways for development in unplanned greenfield areas which would otherwise be appropriate and/or have positive outcomes.	Not Stated	Consistent with Wellington City Council's position on the matter	Allow

S211 Hutt City Council	S211.011	Policy WH.P3	Amend	Supports the use of actions plans to achieve objectives, provided that they are developed in partnership with territorial authorities.	Amend Policy WH.P3 as follows:  Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways The Wellington Regional Council shall, in partnership with mana whenua and territorial authorities, prepare and deliver Freshwater Action Plans in accordance with Schedule 27 (Freshwater Action Plan). The first iteration of Freshwater Action Plans, to cover all rivers and lakes in the Whaitua Te Whanganui-a-Tara, shall be completed by December 2026. Freshwater Action Plans shall identify, in detail, the actions, including to support effective regulation, to achieve the target attribute states, and support relevant environmental outcomes, set in this Plan.	Consistent with Wellington City Council's position on the matter	Allow
S211 Hutt City Council	S211.017	Policy WH.P31	Amend	Disagrees with the s32 evaluation, which states that there is higher risk of sediment discharge during the winter period (June-September). Considers that large storm events can occur throughout the year, resulting in large sediment discharges. Considers that earthworks during the winter period may be appropriate when there is a poor summer earthworks period due to adverse weather. Considers a BAU approach for winter earthworks should be maintained as a standard condition of consent as a discretionary activity which would allow GW to provide permits to undertake earthworks within this period as appropriate and subject to conditions.	Delete policy	Consistent with Wellington City Council's position on the matter	Allow
S261 Forest & Bird	S261.051	Objective WH.O3	Oppose	Considers timeframe too far away to ensure coastal values in Te Whanganui-a-Tara are not compromised.	Amend timeframe for achievement to 2030. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.	Inconsistent with Wellington City Council's position on the matter	Disallow

S261 Forest & Bird	S261.099	Rule WH.R5	Oppose	Considers greater Council oversight is required for elements of the rule, noting clause (h) is not sufficiently certain and enforceable for a permitted activity. Considers higher activity status and adding clearer and enforceable standards are required to ensure compliance with RMA s70, and that cumulative significant adverse effects do not arise. Considers WSUD should be required at minimum.	Reclassify as a controlled activity. Include enforceable alternative standards. Distinguish between discharges that would not have significant adverse effects on aquatic life and those having such effects that then require consent under a higher activity classification. Require "water sensitive urban design" as a condition of consent, including rainwater storage tanks at a property level (which are accessible to provide water for gardening and emergency water supply) and stormwater treatment via wetlands, swales, and rainwater gardens. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.	Inconsistent with Wellington City Council's position on the matter	Disallow
S248 Ara Poutama Aotearoa the Department of Corrections	s248.017	Redevelopment	Amend	Seeks reference to redevelopment of existing urbanised property is removed, as the definition also applies to rules that are not exclusively limited to redevelopment of urbanised property - refers to WH.R11 for example. Secondly, reference to "minor" under the first bullet point should be removed as the term 'minor' is subjective and adds uncertainty to scope of definition.	Amend as follows:  For the purpose of assessment of a proposal involving the redevelopment of an existing urbanised property (i.e brownfield development, upgrades to existing roads etc.) in relation to stormwater effects, this includes the replacement, reconstruction or addition (new) of impervious surfaces. Excludes: - minor maintenance or repairs to roads, carparking areas, driveways, and paving - installation, maintenance or repair of underground infrastructure or network utilities requiring trenching and resurfacing -activities that only involve the re-roofing of existing buildings.	Consistent with Wellington City Council's position on the matter	Allow