

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.
 - 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.

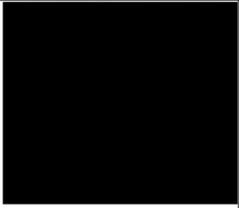
Further Submission Form requirements:

- 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	
Name of Submitter: (First and last name, or organisation / company)	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd
Address for service: (Email, or physical address) Please note an <u>email address</u> is the preferred method	Rod.halliday@hrmlimited.co.nz
Phone: (Optional)	Insert
Contact person for submission: (If different to above)	Rod Halliday
I wish to be heard in support of my submission at a hearing:	Yes

I would consider presenting a joint case at the hearing with others who make a similar submission:	Yes
2. Criteria applicable to Further Submitter:	
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	Yes
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	Yes
C) I am the local authority for the relevant area.	No
Specify the reasoning behind why you qualify for either of these above options:	Submitter Is affected by proposed provisions

3. For the further submitter to action
Service of your further submission: 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. Each submitter has an address for service available at: www.gw.govt.nz/nrp-pc1-submissions . 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.

4. Disclosures:	
If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation	 08.03.24

Public information: 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 Plan Change 1 to the Natural Resources Plan Information Statement . 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 privacy@gw.govt.nz .

5. Further Submission:
<ul style="list-style-type: none"> 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"> NRP PC 1 - Summary of Decisions Requested – By Submitter NRP PC 1 - Summary of Decisions Requested – By Provision 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. If you are providing suggested text amendments to a provision, please do so in the following format: Suggested added text, shown as bolded text format Suggested deleted text, shown as struck through format

4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

*Submitter name or, Submitter number of the submission you are commenting on:	*Submission point number:	*Provision	*Decision sought: <i>(Allow, Disallow, Allow in part, or Disallow in part)</i>	Decision sought <i>Illustrate which aspects of this original submission that you support or oppose.</i>	Reasons: <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
S219 Cuttriss Consultants Ltd	S219.002 S219.003 S219.004 S247.002 S247.003 S247.004 S219.005 S247.005	Entire Document	Allow	Withdraw PC1	Agree that inadequate consultation was undertaken before PC1 was notified. As a result, PC1 is contrary to Subpart 1/Clause 3.2(1) of the NPS-FW which specifies that: <i>“Every regional council must engage with communities and tangata whenua to determine how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the region.”</i>
S243 Land Matters Limited	S243.033 S243.034	Entire Document	Allow	Withdraw PC1	A draft should have been released for consultation with the community, including the development community. Doing so would limit appeals and ensure a more workable less idealistic document is prepared.
S219 Cuttriss Consultants Ltd	S219.001	General comments - definitions	Allow	Add definition of greenfield development	There is a disconnect between the outcomes being sought by TAs giving effect to the NPS-UD and PC1. Even though the NPS-FW and the NPS-UD have the same status under the RMA. PC1 conflicts with the intended outcomes of the NPS-UD, being to provide for well-functioning urban environments, including both through infill, and greenfield developments. NPS-UD Policy 6 requires planning decisions that affect urban environments to consider the benefits of urban development and the contributions that development makes to provide or realise development capacity, and this has not been sufficiently considered in PC1 as economic impacts have not been adequately assessed.

S239 Orogen Limited	S239.002	General comments - definitions	Allow	Add definition of 'greenfield development'	<p>A definition of 'greenfield development' is required to provide certainty regarding the application of new rules particularly for the application of Rules WH.R6 and P.R6.</p> <p>The final definition should be prepared in consultation with relevant stakeholders.</p>
S219 Cuttriss Consultants Ltd	S219.002	General comments - overall	Allow	Withdraw PC1	<p>There is insufficient detail on the types of hydrological controls required for various types and scales of development.</p> <p>The standards pose significant burdens on property owners and developers.</p> <p>Engineering advice should not be necessary for the creation of small impervious areas.</p> <p>PC1 does not adequately evaluate financial costs on landowners, developers and ratepayers, including flow-on costs on the commercial viability of housing supply and affordability.</p>
S33 Wellington City Council	S33.005	General comments - stormwater management	Allow	Withdraw PC1	<p>The proposed framework for managing the effects of stormwater runoff from development is already or will be regulated through TA's district plans and this would lead to applicants going through two different consenting processes. Stormwater runoff from development should be regulated at the TA level only.</p>
S247 Carrus Corporation Ltd	S247.008	Unplanned greenfield development t	Allow	Withdraw PC1 or remove prohibited activity status for greenfield development.	<p>The use of the prohibited activity rule is a blunt instrument which conflicts with the NPS-UD and in particular Policy 8 and as such could prevent TAs from meeting their ongoing requirements under the NPS-UD.</p>
S33 Wellington City Council	S33.004 S33.018	General comments - unplanned greenfield development	Allow	Withdraw PC1 or remove prohibited activity status for greenfield development.	<p>This provision is likely to lead to unintended consequences.</p> <p>Prohibited activity status will affect the ability of territorial authorities to make strategic decisions on growth and create difficulties with minor changes to urban zoning.</p>

					<p>The prohibited status has not been reasonably justified, and that alternatives that could achieve the strategic intent of the rule without requiring a dual plan change process.</p> <p>The prohibited status removes a consenting pathway for proposals that may have positive outcomes for the community and for freshwater.</p> <p>The s32 evaluation suggest that contaminants can be addressed through a combination of treatment and financial contributions, therefore prohibited activity status inappropriate.</p> <p>The requirement for two plan changes to enable greenfield development on the basis that it will create challenges for the private sector's responsiveness to the housing needs, is onerous and costly, and could jeopardise the economic viability of development and supply of affordable housing.</p> <p>The prohibition laden objective and policy framework (both in NRP and RPS) would render future plan change an impossibility due to not implementing the higher order documents, and any section 32 analysis would be at risk of identifying development as being contrary to objectives and policies in these plans.</p> <p>GWRC should be considering each development individually, based on the merits and the impacts it has on the environment and any mitigation propose.</p>
S243 Land Matters Limited	S243.036	General comments - urban development –.	Allow	Remove the new requirements for stormwater management and financial contributions from all new stormwater discharge provisions or amended to provide a more balanced approach to catchment management.	<p>PC1 introduces increased uncertainty and cost to the provision of housing in Wellington region, directly affecting housing affordability.</p> <p>The requirement for financial contributions and risk cost introduced through additional consenting will have flow on effects to the cost of housing in the region and is inconsistent with Objective 2 and associated policies of NPS-UD.</p>

S33 Wellington City Council	S33.003	General comments - water quality	Allow	Remove all requirements in relation to brownfield sites.	<p>WCC is already engaging in multiple statutory and non-statutory processes in processes to achieve water quality improvements.</p> <p>PC1 would require all brownfield development to seek consent for stormwater discharges from both District and Regional Councils, which is an unnecessary duplication.</p>
S33 Wellington City Council	S33.013	Redevelopment - Support	Allow	<p>Amend the definition taking into account for the issues raised by the submitters.</p> <p>Delete all associated rules requiring additional consents from GW for consent for development.</p> <p>If the above is not done provided exemptions for maintenance, extensions and alterations. Make it clear that these rules do not apply when the redeveloped of site does not increase the permitted hard surfacing on the site ie: the current hard surfacing + and allowance provide for under the definition and/or rules.</p>	<p>The proposed definition is unreasonable. It does not take into consideration the need to intensify development in urban areas and overlaps with the functions of territorial authorities and the consideration for stormwater management as set out in 80E of the RMA and 3.5(4) of the NPS-FM.</p> <p>The definition does not work in the context of the NPS-UD and conflicts with the Policies of PC1. For example Policy WH.P2 seeks to "encourage" redevelopment, but associated provisions, including this definition do not permit the associated increases in impervious surfaces that would be expected with the use of this term in a policy.</p> <p>WH.R4 refers to "redevelopment of existing impervious surfaces" which implies that the definition of redevelopment is inclusive of maintenance of existing impervious surfaces.</p> <p>The definition should exclude minor alterations and additions to existing buildings to provide for the small redevelopment of existing sites as a permitted activity in associated rules.</p> <p>Except where required in relation to heritage buildings, zinc or copper roofs should be excluded from the final exception clause.</p>
S219 Cuttriss Consultants Ltd	S219.007	Redevelopment -	Allow		<p>Concerned about implications definition may have on business-as-usual activities undertaken by territorial authorities and infrastructure providers.</p>

					<p>What does “minor maintenance or repairs to roads, carparking areas, driveways and paving” mean?</p> <p>It is egregious to require 'like for like' replacements and renewals. Redevelopment of a site should be permitted provide the overall impervious surface area is not increased.</p>
S33 Wellington City Council	S33.097	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Allow	Delete policy as notified, or significantly modify to address the concerns raised in these submissions, including removing the words “from new greenfield developments” and lowering all treatment targets.	<p>The proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes.</p> <p>Financial contributions to offset all residual adverse effects regardless of scale is inconsistent with the RMA and NPS-FM, which only requires mitigation of residual adverse effects that are more than minor.</p> <p>TAs already collect financial contribution towards stormwater upgrades. GW requiring them is an unnecessary duplication.</p> <p>The proposed financial contribution will decrease housing affordability.</p> <p>A mandatory flat fee financial contribution may incentivise large lots over intensification.</p>
S219 Cuttriss Consultants Ltd	S219.012	Policy WH.P31: Winter shut down of earthworks.	Allow	Delete policy and make earthworks great than 3,000m ² between 1 June and 30 September a Discretionary Activity.	<p>This policy is written in the form of a rule or standard rather than outlining how an objective will be implemented.</p> <p>The current method of site-specific assessments during winter works is achieving the objectives of the NPS-FW.</p> <p>Shutting down all work during this period would significantly increase the costs and is impractical for large of projects including large infrastructure projects that take years to complete.</p>
S239 Orogen Limited	S239.004	Policy WH.P31: Winter shut down of earthworks.	Allow		
S243 Land Matters Limited	S243.019	Policy WH.P31: Winter shut down of earthworks.	Allow		
S247 Carrus Corporation Ltd	S247.012	Policy WH.P31: Winter shut down of earthworks.	Allow		

S33 Wellington City Council	S33.060	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	Allow	Delete If not deleted significantly amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.	<p>The proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes.</p> <p>PC1 Rule WH.R5 would require all brownfield developments to seek consent for stormwater discharges from both District and Regional Councils, which is an unnecessary duplication.</p> <p>Requiring two consents for the same thing from two different consent authorities is unnecessary and inefficient and will lead to increased costs for all.</p> <p>Stormwater discharges are already managed via a global stormwater discharge consent, and TAs manage land use and therefore stormwater discharges via the land use consent process.</p> <p>(a) Should be deleted as it discourages development of large brownfield sites. This is something which should be encouraged. Especially as GW is effectively preventing any future greenfield development.</p> <p>(b) Should be deleted as the materials used are controlled by TAs. A policy in the NRP would be sufficient as TAs will have to incorporate appropriate rules into their District Plans to meet that policy.</p> <p>(c) Territorial authorities are responsible for the discharged from their networks. A policy in the NRP would be sufficient as TAs will have to incorporate appropriate rules into their District Plans to meet that policy.</p> <p>(c)(i) Is somewhat ironic. Why is it necessary to implement hydrological controls for greenfield development. when PC1 effectively bans them.</p>
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					<p>(c)(ii) applies equally to existing and new impervious surfaces >30m². So, in effect any redevelopment (eg relaying a section of a drive) or new work (installing a carpad) >30m² would require a GW consent.</p> <p>Clause (c) is too vague as it does not specify what the hydrological controls have to achieve and there is insufficient detail on the types of hydrological controls required for various types and scales of development. Engineering advice should not be necessary for the creation of impervious areas of 31m².</p> <p>The new requirements are inconsistent with provisions relating to housing affordability in the NPS-UD, and their costs are not addressed in the s32 report. These changes are likely to add considerably to the cost of developing and as a result will add to housing prices.</p> <p>Bring the PC1 rules in with immediate effect will result in the need to redesign numerous pre- committed projects, and may impact upon their viability. This was not considered in the s32 analysis.</p>
S33 Wellington City Council	S33.138	Schedule 30: Financial Contributions	Allow	Delete Schedule 30.	<p>There should not be financial contributions on stormwater discharges. Including:</p> <p>TAs already collect financial contribution towards stormwater upgrades. GW requiring them is an unnecessary duplication.</p> <p>PC1 will have significant consequences for affordability of housing and land development in Wellington Region. The significant financial contribution for new residential units will have flow on housing affordability effects in the region and is inconsistent with Objective 2 and associated policies of NPS-UD. This has not been considered in the Section 32 report which ignores the housing affordability implications of the proposed changes.</p>
S243 Land Matters Limited	S243.032	Schedule 30: Financial Contributions.	Allow		
S247 Carrus Corporation Ltd	S247.032	Schedule 30: Financial Contributions.	Allow		

					<p>A mandatory flat fee financial contribution may incentivise large lots over intensification.</p> <p>The requirement for financial contributions and risk cost introduced through additional consenting will have flow on effects to the cost of housing in the region and is inconsistent with Objective 2 and associated policies of NPS-UD.</p> <p>Financial contributions to offset all residual adverse effects regardless of scale is inconsistent with the RMA and NPS-FM, which only requires mitigation of residual adverse effects that are more than minor.</p> <p>It is not clear what the financial contributions will be used for. It is unreasonable to collect these contributions tax prior to consent being given effect to. This may make some developments non-viable exacerbating the current housing availability and affordability issues. The schedule also requires the tax be based on the number of EHU's expected to be delivered. This is impossible to predict if the application relates simply to earthworks.</p>
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