

FURTHER SUBMISSION ON PROPOSED PLAN CHANGE 1 TO THE NATURAL RESOURCES PLAN FOR THE WELLINGTON REGION UNDER CLAUSE 8 SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT 1991

TO: Greater Wellington Regional Council ("**Council**")
regionalplan@gw.govt.nz

SUBMITTER: Waste Management NZ Limited ("**Waste Management**")

SUBMISSION ON: Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region ("**PC1**")

Introduction

1. Waste Management is New Zealand's largest waste and environmental services company. It has a variety of interests in the Wellington Region, including a hazardous waste facility at 57-59 Port Road, the Seaview Refuse Transfer Station at 27 Seaview Road, and a proposed resource recovery park at 30 Benmore Crescent.
2. Waste Management has an interest in the proposal which is greater than the interest of the general public as it made a primary submission and because the development potential of its sites will be directly impacted by PC1.

Scope of further submission

3. Waste Management made an original submission on PC1 on 15 December 2023. Waste Management wishes to make a further submission on PC1. This further submission supports and opposes various submission points as set out in **Attachment 1**.
4. Waste Management could not gain an advantage in trade competition through this submission.

Reasons for further submission

5. For those provisions of PC1 that require amendment as sought by Waste Management's original submission, those provisions will not (without the amendments proposed by Waste Management):
 - (a) promote sustainable management of resources or achieve the purpose of the Resource Management Act 1991 ("**RMA**") and are contrary to Part 2 and other provisions of the RMA;
 - (b) meet the reasonably foreseeable needs of future generations;
 - (c) enable social, economic and cultural wellbeing;
 - (d) achieve integrated management of effects of use, development or protection of land and resources in the Wellington Region;
 - (e) enable the efficient use and development of Waste Management's assets and operations, and of those resources; and
 - (f) appropriately achieve the objectives of the Regional Policy Statement, in term of section 32 of the RMA.

Specific reasons for submission

6. Without derogating from the generality of above, the specific reasons for Waste Management's further submissions as set out in **Attachment 1** to this submission.

Decision Sought

7. Waste Management seeks for the submissions which Waste Management supports to be allowed, and the submissions which Waste Management opposes to be disallowed.

8. Waste Management wishes to be heard in support of this further submission. If others make a similar submissions consideration would be given to presenting a joint case with them at any hearing.

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Head of Environment and Consents

Date: 8 March 2024

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ATTACHMENT 1 – WASTE MANAGEMENT NZ LIMITED FURTHER SUBMISSION ON PC1

Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
Interpretation - High Risk industrial and trade premise ('HRITP')					
S226 Higgins Contractors Ltd	S226.002	<p>Considers definition too vague and could lead to misinterpretation. Suggests for activities not listed, intent of definition appears to be if risk of contaminants entering stormwater, HRITP rules are relevant. Concerns definition puts too much interpretation to the applicant, with risk of non-compliance if Council interpret the risk of the activity differently to applicants.</p> <p>Relief Sought: Amend definition of HRITP to be more specific and clearer in the intent. Provide exceptions for HRITPs for example where discharges are treated via an interceptor.</p>	Support in part	The current definition is ambiguous and the intent (to stop high risk contaminants becoming entrained in stormwater discharges) needs to be clear.	Allow in Part
S220 Rosco Ice Cream Ltd	S220.003	Notes the key points of this definition are that the activity involves contaminants / hazardous substances and that these are exposed to rain. Conditionally supports the definition as the definition requires exposure to the weather.	Support	The definition needs to be clear that it is areas of a site exposed to rain that fall within the definition.	Allow
S207 Firth Industries Ltd	S207.005	<p>Opposes list of activates [sic] which 'could' be high risk industrial or trade premises. Includes various activities which could be managed so that hazardous substances are not exposed to rain (and therefore would not fall within the definition).</p> <p>Relief sought: Seeks definition be amended to delete the list of activities that 'may' be industrial and trade activities.</p>	Support in part	The definition needs to be clear that it is areas of a site exposed to rain that fall within the definition. Waste Management is neutral on deletion of the list of activities.	Allow in part

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S183 Yvonne Weebar	S183.021	Submitter supports definition – no relief sought.	Oppose	Amendments to the definition are required to make it clear.	Disallow
S186 Guardians of the Bay	S186.013				
S209 Enviro NZ Services Ltd (Enviro NZ)	S209.001	Considers limiting the definition to premises that use contaminants that are exposed to rain does not penalise entirely internal operations and encourages good environmental outcomes.	Support in Part	Waste Management supports the submission in so far it recognises that activities that are internal are not included in the definition of high risk premise.	Neutral
Definition – Impervious Surface					
S26 Christine Stanley	S26.010	Concerned that specifications regarding impervious surface water collection into tanks is not included in costing assessments in the s32 report. Relief Sought: Delete definition	Oppose	Waste Management supports a definition of impervious surface in order to clearly apply stormwater rules. However, this definition needs to be amended as per Waste Management's primary submission.	Disallow
S33 Wellington City	S33.002	Definition is complex and difficult to implement. The use of impermeable surfaces (permeability) is also a matter of consideration for District Plans as set out in 80E of the RMA and 3.5(4) of the National Policy Statement on Freshwater Management. Relief sought: Delete definition.	Oppose	Waste Management agrees with the submitter that the definition is complex and difficult to implement. However, Waste Management supports a definition of impervious surface in order to clearly apply stormwater rules.	Disallow
S38 Summerset Group Holdings Limited	S38.002	Considers roofing with rainwater collection, complying with hydraulic neutrality rules included in recent district plans in these catchments should not be considered an impervious surface. Suggests that the implementation of grey water reuse would add to development costs, and is not a	Support in part	Waste Management agrees that surfaces draining to tanks should be excluded from the definition. However, if a development choses to utilize grey water tanks, these should also be excluded from the definition of impermeable surface.	Allow in part

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		<p>requirement of any regulation including PC1 or the Natural Resources Plan.</p> <p>Relief sought: Amend - Surfaces that prevent or significantly impede the infiltration of stormwater into soil or the ground, includes: • roofs • paved areas (including sealed/compacted metal) such as roads, driveways, parking areas, sidewalks/foot paths or patios, and excludes: • grassed areas, gardens and other vegetated areas • porous or permeable paving • slatted decks which allow water to drain through to a permeable surface • porous or permeable paving and living roofs • roof areas with rainwater collection and reuse • any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed).</p>			
S105 Hannah Bridget Gray (No2) Trust	S105.004	<p>Use of rain tanks, grey water reuse systems or any form of water collection and reuse should be encouraged as a responsible and environmentally friendly use of water rather than included in calculations as if it were environmentally damaging.</p> <p>Relief Sought: roof areas with rainwater collection and reuse any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)</p>	Oppose	Waste Management agrees use of tanks should be encouraged but opposes the deletion of tanks from the exclusions to what is considered 'impervious surface'.	Disallow
S151 Wellington Water Ltd	S151.002	Broadly supports the definition, but reserves position as to the detail as some technical changes required. For example, the use of	Support in part	Waste Management considers exemptions for rainwater tanks should be retained as	Allow in part

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		<p>"stormwater" here is not consistent with how that term is defined in the Natural Resources Plan and some other terms are used inconsistently. Concerned about how the exemptions for tanks and rainwater collection will impact the applicability of the stormwater rules.</p> <p>Relief Sought: Replace the reference to "stormwater" with 'rainfall', 'water', 'precipitation', or similar. Review and refine the list of exclusions in light of their implications for the rules. Refer to aggregate rather than metal. Remove duplicate references to 'porous or permeable paving'. Reconsider the reference to "reuse" which should be for 'non-potable purposes' to align with RPS language rather than 'grey water'. The final two bullet points have different approaches to permanent plumbing and use different terms for the same outcome (non-potable water use); this needs to be reconsidered also. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.</p>		<p>part of the definition. Waste Management also supports clarification of the definition.</p>	
S161 Gillies Group Management Ltd	S161.008	<p>Considers a roof with rainwater collection should not be considered an impervious surface where it complies with hydraulic neutrality rules. Considers the implementation of greywater reuse is not a regulatory requirement and will significantly add to development costs.</p>	Oppose	<p>Waste Management agrees that areas draining to a rain water tank should be excluded from the definition of impervious surface. However, where developers choose to use a grey water tank, this also should be excluded from the definition of impervious surface.</p>	Disallow

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		Relief sought: excludes: grassed areas, gardens and other vegetated areas porous or permeable paving slatted decks which allow water to drain through to a permeable surface porous or permeable paving and living roofs roof areas with rainwater collection and reuse any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed):			
S165 Pukerua Holdings Limited	S165.008	Relief sought: excludes: grassed areas, gardens and other vegetated areas porous or permeable paving slatted decks which allow water to drain through to a permeable surface porous or permeable paving and living roofs roof areas with rainwater collection and reuse any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed):	Oppose	Waste Management agrees that areas draining to a rain water tank should be excluded from the definition of impervious surface. However, where developers choose to use a grey water tank, this also should be excluded from the definition of impervious surface.	Disallow
S169 Koru Homes NZ Limited	S169.002	Relief sought: excludes: grassed areas, gardens and other vegetated areas porous or permeable paving slatted decks which allow water to drain through to a permeable surface porous or permeable paving and living roofs roof areas with rainwater collection and reuse any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed):	Oppose	Waste Management agrees that areas draining to a rain water tank should be excluded from the definition of impervious surface. However, where developers choose to use a grey water tank, this also should be excluded from the definition of impervious surface.	Disallow
S173 Arakura Plains Development Limited	S173.008	Relief sought: excludes: grassed areas, gardens and other vegetated areas porous or permeable paving slatted decks which allow water to drain through to a permeable surface porous or permeable paving and living roofs	Oppose	Waste Management agrees that areas draining to a rain water tank should be excluded from the definition of impervious surface. However, where developers choose to use a grey water tank, this also	Disallow

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		<p>roof areas with rainwater collection and reuse any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed).</p>		should be excluded from the definition of impervious surface.	
S210 Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate	S210.009	Seeks definition of 'impervious surfaces' be retained as currently written.	Oppose	The definition needs to be clarified as per Waste Management primary submission.	Disallow
S220 Rosco Ice Cream Ltd	S220.005	Provide technical guidance on the detail of how to achieve porous/permeable paving and the reticulation/storage systems required for water collection and reuse.	Support	Technical guidance will assist in interpretation of the plan provisions and the definition of impermeable surface.	Allow
S240 Porirua City Council	S240.011	<p>Notes there is no rule requiring rainwater reuse in PC1 or the Natural Resources Plan. Supports 'roof areas with rainwater collection' being excluded, as this is regulated through the Three Waters Chapter of the Proposed Porirua District Plan subject to Wellington Water specifications that provide for some limited reuse for gardening but do not require tanks to be plumbed back into the house. Concerns that this is a significant cost that not been assessed in the s32 Evaluation.</p> <p>Relief Sought: excludes: grassed areas, gardens and other vegetated areas porous or permeable paving slatted decks which allow water to drain through to a permeable surface</p>	Oppose	Waste Management agrees that areas draining to a rain water tank should be excluded from the definition of impervious surface. However, where developers choose to use a grey water tank, this also should be excluded from the definition of impervious surface.	Disallow

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		porous or permeable paving and living roofs roof areas with rainwater collection and reuse any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed).			
S257 Kāinga Ora	S257.005	Retain notified definition.	Oppose	Waste Management considers the definition needs to be amended as per Waste Management's primary submission.	Disallow
S258 BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Co	S258.003	Supports impervious surfaces definition.	Oppose	Waste Management considers the definition needs to be amended as per Waste Management's primary submission.	Disallow
Definition – Stormwater					
S220 Rosco Ice Cream Ltd	S220.007	Supports the definition of stormwater, in particular the exclusions. Notes a typographical error referring to rules in sections "8.2 and 9.2", which should refer to sections 8.3 and 9.3. Relief Sought: Correct typographical error to refer to correct sections.	Support	Waste Management agrees with correction of typographical errors identified and retention of the definition.	Allow
Definition – Stormwater Network					
S33 Wellington City Council	S33.006	Considers it appropriate to consider stormwater treatment systems that serve more than one property. Relief sought: Retain as notified.	Oppose	Assets in private ownership should not be defined as part of the stormwater network. Considers definition should be amended as per Waste Management primary submission.	Disallow
Definition – Unplanned Greenfield Development					
S286 Taranaki Whānui	S26.009	Relief sought: Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 and excludes: -land either currently owned by	Support in part	Waste Management supports land identified as "unplanned greenfield development" on the maps owned by Mana Whenua being	Allow in part

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		<p>mana whenua, or identified for potential future ownership through a right of first refusal or deferred selection process through Treaty Settlements. which also require an underlying zone change (from rural/nonurban/ open space to urban) through a District Plan change to enable the development. Note: Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023.</p>		<p>excluded from the definition of Unplanned Greenfield Development.</p> <p>Waste Management, however, considers that Map 89 needs to be amended as per Waste Management's original submission.</p>	
Kainga Ora S257	S257.009	<p>Amendments sought a full review of, and expansion to the areas identified as planned/existing urban areas on maps 86-89. Exclusion of land zoned as open space areas from unplanned greenfield areas where these are located in an urban environment. Include new definition for Greenfield Development. Within this definition, seek also an exclusion of infrastructure works (as infrastructure works often traverses non-urban zones to service the urban environment). Further infrastructure works (including network upgrades) can result in the enhancement and betterment of environmental and water quality outcomes). Delete associated Prohibited Activity rule framework / or reduce activity status to align with the National Policy Statement-Urban Development. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.</p>	Support in Part	<p>Waste Management supports the part of the submission that seeks deletion of associated prohibited activity rule framework. Waste Management has no position on open space zoned land.</p>	Allow in part

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
S252 Thames Pacific	S252.008	<p>Requests the deletion of this definition and all subsequent references to unplanned greenfield development. Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 which also require an underlying zone change (from rural/nonurban/ open space to urban) though a District Plan change to enable the development. Note: Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023. Amend definition to align with zones under a District Plan and avoid a plan change to both District and Regional Plans:</p> <p>Should the above relief not be obtained, submitter seeks the following revision: Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 not zoned as urban within a District Plan. which also require an underlying zone change (from rural/nonurban/open space to urban) though a District Plan change to enable the development. Note: Unplanned greenfield areas are identified on maps 86, 87, 88 and 89 those areas and include those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023. And consequential amendments to other references or policies</p>	Support in part	<p>Waste Management supports the part of the submission that refers to the requirement for a plan change. Waste Management considers the definition should be further amended to clarify what is defined as greenfield development, as per Waste Management's primary submission.</p> <p>Waste Management agrees with the submitter in that sometimes a resource consent application is more appropriate or efficient than a plan change.</p>	Allow in part

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		as needed to align with the above amendment.			
S248 Ara Poutama Aotearoa the Department of Corrections	S248.018	Provide a definition of "greenfield development" as follows: Greenfield development: Urban development on land that has not been previously developed for urban land uses. As a consequential amendment, add a definition for "urban development" in the Natural Resources Plan to match the Regional Policy Statement definition as follows: Urban development is subdivision, use and development that is characterised by its planned reliance on reticulated services (such as water supply and drainage) by its generation of traffic, and would include activities (such as manufacturing), which are usually provided for in urban areas. It also typically has lots sizes of less than 3000 square metres.	Support in Part	Waste Management agrees the definition needs to be clarified and that greenfield development is characterized by reliance on reticulated infrastructure found in urban and future urban zones. As per Waste Management primary submission, Waste Management consider the definition should be clarified to refer to public infrastructure.	Allow in part
S247 Carrus Corporation Ltd	S247.008	Requests the deletion of this definition and all subsequent references to unplanned greenfield development. Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 which also require an underlying zone change (from rural/nonurban/ open space to urban) though a District Plan change to enable the development. Note: Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023. Amend definition to align with	Support in Part	Waste Management agrees the definition needs to be clarified and that greenfield development is characterized by reliance on reticulated infrastructure found in urban and future urban zones. As per Waste Management's primary submission, Waste Management considers the definition should be clarified to refer to public infrastructure.	Allow in part

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		<p>zones under a District Plan and avoid a plan change to both District and Regional Plans:</p> <p>Should the above relief not be obtained, submitter seeks the following revision: Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 not zoned as urban within a District Plan. which also require an underlying zone change (from rural/nonurban/open space to urban) though a District Plan change to enable the development. Note: Unplanned greenfield areas are identified on maps 86, 87, 88 and 89 those areas and include those areas that do not have an urban or future urban zone at the time of Plan Change.</p>			
S240 Porirua City Council	S240.014	<p>Concerned the definition and associated provisions may result in unintended consequences with no consenting pathway to consider a proposal located in these areas that may have positive outcomes, including for freshwater. Notes this is covered in more detail in relation to Policy P.P2 in the submission. Considers Map 86 will not align with the decisions version of the Proposed Porirua District Plan (covered in more detail in relation to Map 86). Considers rezoning development areas requires the application of a range of zones, including from rural to open space zones for future reserves, therefore the following is not always</p>	Support in Part	<p>Waste Management agrees with the concern that the provisions may result in unintended consequences with no consenting pathway to consider a proposal located in these areas that may have a positive outcome. Waste Management has no position on Map 86. Waste Management disagrees and does not support the proposed amendment to the definition in so far as it makes reference to a requirement for a plan change to occur.</p>	Allow in part

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		<p>accurate: '(from rural/nonurban/ open space to urban)', nor is the note.</p> <p>Relief Sought: Amend definition as follows: Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 which also require an underlying zone change (from rural/nonurban/ open space to urban) though a District Plan change to enable the development. Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023.</p>			
S238 Greater Wellington Regional Council	S238.009	Amend definition as follows: Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 which as at 30 October 2023 also requires an underlying zone change to an urban zone, future urban zone or settlement zone to enable the development.	Oppose	Waste Management supports the intent to clarify the definition. However, as per Waste Management's primary submission, no development 'requires' a plan change unless it is prohibited. It is possible to seek resource consent for the development of an individual site and sometimes a more efficient pathway than undertaking a plan change.	Disallow
S225 Upper Hutt City Council	S225.048	Opposes extent of Map 88 as does not accurately reflect Council plan change 50 notified on 4 October 2023 and is inconsistent around proposed settlement zone land. Considers provision should apply from date of PC1 decision and not date of notification. Considers it gives landowners and developers ability to complete planning processes (such as in train resource consents or plan changes). Current date as	Support	Waste Management agrees with amendments that recognize planning processes that are in place in terms of the effective date of the provisions. As per Waste Management primary submission Waste Management consider an exclusion should also be made where resource consent has been lodged for urban development.	Allow

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		notified, would circumvent ongoing planning process and prevent rezoning submissions on active plan changes.			
S217 R P Mansell; A J Mansell, & M R Mansell	S217.003	<p>Concerned development in areas identified as unplanned greenfield development require a plan change process to enable the development. Considers the dual plan change process required under PC1 to change greenfield development from unplanned to planned should not be used as an alternative to the resource consenting process. Concerned the private plan change process will not be effective. Opposes only planned greenfield development being provided for in PC1 and unplanned greenfield development requiring a dual plan change. Considers that the prohibition of activities is contrary to the National Policy Statement-Urban Development. Considers insufficient evidence is provided in the s32 report.</p> <p>Relief Sought: All greenfield development to be considered on their merits, and rely on provisions in the Natural Resources Plan and district plan zoning/provisions to manage adverse effects of greenfield development. Delete all provisions referencing "unplanned greenfield development". Delete definition for "unplanned greenfield development"</p>	Support in part	Waste Management agrees with the submission in so far as in some occasions a resource consent process may be a more effective approach to resource management than a plan change process.	Support in part
S207 Firth Industries Limited		Provide a definition of "greenfield development" as follows: Greenfield development means any urban development undertaken within a site or sites has not been	Support in Part	Waste Management agrees that the definition needs to define greenfield development. However, Waste Management considers that in some cases,	Allow in part

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		previously used for urban land use. As a consequential amendment, provide a definition of "urban development" to match the Regional Policy Statement definition as follows: Urban development is subdivision, use and development that is characterised by its planned reliance on reticulated services (such as water supply and drainage) by its generation of traffic, and would include activities (such as manufacturing), which are usually provided for in urban areas. It also typically has lots sizes of less than 3000 square metres.		the development of a site that has not been previously developed, is not appropriately defined as greenfield development. As per Waste Management's primary submission, the definition should make reference to the need for public infrastructure construction to support the development.	
S30 Dean Spicer	S30.005	Remove prohibited activity status and allow applications for new unplanned greenfield developments.	Support	Waste Management agrees with the submitter that in some occasions an application for resource consent may be appropriate for greenfield development, or for areas identified as 'unplanned greenfield development areas'.	Allow
S33 Wellington City Council	S33.018	Amend definition to take into account smaller sites within the existing urban boundary or delete definition.	Support	Waste Management agrees that some smaller sites within the existing urban boundary should be taken into account.	Allow
S37 Donald Skerman	S37.001	Supports the prohibition of unplanned greenfield development, the requirement to treat 85% of stormwater on urban development sites, and the mandatory financial fee for greenfield developments.	Oppose	Waste Management oppose the prohibition of greenfield development as set out in Waste Management's primary submission.	Disallow
Map 89					
S220 Rosco Ice Cream Limited	S220.021	Opposes the inclusion of the site at 30 Benmore Crescent within the Hutt City Council unplanned greenfield area as shown on Map 89. Notes the site is currently zoned General Rural in the Lower Hutt City Council	Support	Waste Management considers the site at 30 Benmore Crescent should be excluded from Map 89.	Allow

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		District Plan but the Draft District Plan Review proposes to rezone the site as General Industrial. Notes the site has been subject to resource consents and is currently subject to additional resource consent applications, and Rosco and Lower Hutt City Council have been involved in planning for the development of the site for the last three years.			
S213 Pareraho Forest Trust	S213.030	Support inclusion of map. Considers it crucial any public or private plan change enabling such development must also propose to change this Plan in order that environmental effects can be fully assessed. Relief sought: retain as notified	Oppose	Waste Management disagrees a public or private plan change to the Natural Resource Plan is necessary. It is not an efficient approach to resource management for the reasons set out in Waste Management's primary submission.	Disallow
S221 Hutt City Council	S211.025	Notes Map 89 reflects the Operative District Plan, however Council is yet to notify a district plan that fully implements the National Policy Statement-Urban Development including the identified demand for housing and business land, therefore considers the avoid/prohibited approach may conflict with the submitter's ability to give effect to the National Policy Statement-Urban Development. Relief Sought: Amend Map 89 to reflect the capacity required to meet identified housing and business demand in Hutt City.	Support in part	Waste Management supports amendment to include land that provides identified capacity for business land being identified on Map 89 (and excluded from unplanned development areas). Waste Management notes the site at 30 Benmore Crescent is proposed to have an industrial zone in a draft of the Proposed District Plan.	Allow in part

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Policy WH.P2					
S286 Taranaki Whanui	S286.032	<p>Considers planning processes need to be flexible to ensure aspirational outcomes are achieved.</p> <p>Relief sought: (a) prohibiting unplanned greenfield development and for managing other greenfield developments by minimising the contaminants and requiring financial contributions as to offset adverse.</p>	Support	A prohibited activity status is not appropriate and will hinder flexibility in planning processes.	Allow
S261 Forest & Bird	S286.063	<p>Relief sought: Amend (a): prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants so that adverse effects are avoided and requiring financial contributions as to offset adverse effects from residual stormwater contaminants Amend clause (e) so that it refers to ephemeral watercourses, wetlands and estuaries. Add clause:(i) land use intensification that individually or cumulatively may lead to a decline in water quality is prohibited.</p> <p>Any further consequential or alternative relief as may be necessary and appropriate to address concerns.</p>	Oppose	<p>The submitter's proposed amendment does not recognize that in some instances water quality can be maintained (or enhanced) by mitigation measures and some level of residual effect may be acceptable in some cases. The use of “avoid” is a very high test and would be overly onerous.</p> <p>As per Waste Management's primary submission the approach to prohibiting activities is not supported.</p>	Disallow
S258 BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	S258.007	Retain Policy WH.P2 as notified.	Oppose	Waste Management disagrees that unplanned greenfield development should be prohibited as per Waste Management's primary submission.	Disallow
S287 Kainga Ora	S287.011	Remove reference to prohibiting unplanned greenfield development at WH.P2(a). Any further, alternative or consequential relief as	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		may be necessary to fully achieve the relief sought in this submission.			
S252 Thames Pacific	S252.009	Amend policy to remove reference to prohibiting unplanned greenfield development. (a) prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants from greenfield developments and requiring financial contributions as to offset adverse effects from residual stormwater contaminants;	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow
S251 Peka Peka Farm Limited	S251.005	Relief sought: (a) prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants from greenfield developments and requiring financial contributions as to offset adverse effects from residual stormwater contaminants;	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow
S248 Ara Poutama Aotearoa the Department of Corrections	S248.040	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (a) prohibiting unplanned greenfield development and for other greenfield developments minimising the discharge of stormwater contaminants from greenfield development, and where residual adverse effects from the discharge of stormwater contaminants are more than minor, requiring aquatic offsetting or compensation (which	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		may include financial contributions) as to offset adverse effects from residual stormwater contaminants, and			
S247 Carrus Corporation Ltd	S247.009	Amend policy to remove reference to prohibiting unplanned greenfield development. (a) prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants from greenfield developments and requiring financial contributions as to offset adverse effects from residual stormwater contaminants.	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow
S246 Water NZ	S246.031	Generally supportive of policy and the clauses to achieve the policy. Relief sought not stated.	Oppose	Waste Management is not supportive of the policy, specifically clause (a) that refers to prohibiting development.	N/A no relief sought.
S245 Tama Potaka, Minister of Conservation	245.003	Amend Policies to be consistent with New Zealand Coastal Policy Statement Policy 23. Requests the following wording be added Promoting design options that reduce flows to stormwater reticulation systems at source.	Neutral	Waste Management does not have a position on the amendment proposed but Waste Management seeks the policy be further amended as per its primary submission.	Neutral
S236 Parkvale Road Limited	S236.006	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (a) prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants from greenfield developments and requiring financial contributions as to offset adverse	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		effects from residual stormwater contaminants, and			
S226 Higgins Contractors	S226.004	Remove the imposition of hydrological controls under (c), or amend wording to have regard to hydrological controls, rather than the imposition of such. Remove requirement of a reduction in contaminant load from stormwater network, or amend to include provisions or small site development discharges.	Neutral	Waste Management agrees that provisions relating to small site development may be effective. Waste Management considers further amendments are required to the policy so remove the reference to 'prohibited' unplanned greenfield activities.	Neutral
S225 Upper Hutt City Council	S225.067	<p>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 Plan Change 1 and recent changes to Natural Resources Plan and therefore would be at risk of being contrary to objectives and policies in these plans.</p> <p>Relief sought: Seek that the policy is amended to read: ... "(a) prohibiting managing 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"</p>	Support	Waste Management agrees that unplanned greenfield development should not be prohibited. Waste Management agrees with the submitters reasoning regarding the opportunities that new development has to mitigate effects of stormwater discharge.	Allow

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
S222 Environmental Defence Society Inc.	S222.035	Relief sought: Amend (f) to require avoidance of significant adverse effects from earthworks, forestry and vegetation clearance activities. Support removal of stock from waterbodies and the coastal environment.	Oppose	<p>The submitter's proposed amendment does not recognize that in some instances water quality can be maintained (or enhanced) by mitigation measures and some level of residual effect may be acceptable in some cases. The use of “avoid” is a very high test and would be overly onerous.</p> <p>As per Waste Management's primary submission the approach to prohibiting activities is not supported.</p>	Disallow
S220 Rosco Ice Cream Ltd	S220.010	Amend the policy to restrict discharges from unplanned greenfield development.	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow
S33 Wellington City Council	S35.005	<p>Concerns regarding the prohibitive provisions framework and if it is the most appropriate to achieve the objectives and policies of the National Policy Statement-Freshwater Management 2020.</p> <p>Relief sought: (a) prohibiting unplanned greenfield development for other greenfield developments minimising the contaminants and requiring contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers (d) requiring a reduction in contaminant loads</p>	Support	<p>Waste Management agrees that unplanned greenfield development should not be prohibited.</p> <p>Waste Management agrees with the submitters concerns regarding the appropriateness of a prohibitive provisions framework to achieve the objectives and policies of the National Policy Statement – Freshwater Management 2020.</p>	Allow

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		from urban wastewater and stormwater networks, through stormwater management strategies, and.			
S38 Summerset Group Holdings Limited	S38.005	Delete clause (a).	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow
S161 Gillies Group Management Ltd	S161.011	(a) prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants from greenfield developments and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow
S165 S165 Pukerua Holdings Limited	S165.011	(a) prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants from greenfield developments and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow
S169 Koru Homes NZ Limited	S169.006	a) prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants from greenfield developments and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow
S173 Arakura Plains Development Limited	S173.011	Delete clause (a).	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
S177 Transpower New	S177.020	<p>Considers policy is inappropriate because definition of "unplanned greenfield development" is broad, uncertain, and could prohibit maintenance, upgrading and development of regionally significant infrastructure. Considers prohibition on unplanned greenfield development is inappropriate and must be removed. If relief sought by submitter on the definition of "unplanned greenfield development" is granted in full, submitter would adopt a neutral position on this aspect of policy.</p> <p>Relief sought: (a) prohibiting unplanned greenfield development and for other greenfield developments minimising the discharge of stormwater contaminants from greenfield development, and where residual adverse effects from the discharge of stormwater contaminants are more than minor, requiring aquatic offsetting or compensation (which may include financial contributions) as to offset adverse effects from residual stormwater contaminants, and.</p>	Support	<p>Waste Management agrees that unplanned greenfield development should not be prohibited.</p> <p>Waste Management agrees with the submitter's reasoning that the provisions could prohibit regionally significant infrastructure, noting Waste Management considers landfills and resource recovery parks to be regionally significant.</p>	Allow
S206 Winstone Aggregates	S206.036	<p>Considers clause (a) prescribes the activity status of an activity, rather than focusing on an adverse effect. Notes "unplanned greenfield development" may be applied generally, given "greenfield development" is not defined.</p> <p>Relief sought: (a) prohibiting unplanned greenfield development and for other</p>	Support	<p>Waste Management agrees that unplanned greenfield development should not be prohibited.</p> <p>Waste Management agrees with the submitters reasoning that the focus should be on adverse effects of an activity rather than the activity itself.</p>	Allow

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		<p>greenfield developments minimising the contaminants generated by urban development, and where there are more than minor residual adverse effects caused by stormwater contaminants requiring aquatic offsetting in first instance, which may include a requiring financial contributions as to an aquatic offset adverse effects from residual stormwater contaminants, and.</p>			
S207 Firth Industries Limited	S207.008	<p>Clause (a) prescribes the activity status rather than addressing adverse effects which is inappropriate for a policy.</p> <p>Relief sought: (a) prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants generated by urban development, and where there are more than minor residual adverse effects caused by stormwater contaminants requiring aquatic offsetting in first instance, which may include a requiring financial contributions as to an aquatic offset adverse effects from residual stormwater contaminants, and.</p>	Support	<p>Waste Management agrees that unplanned greenfield development should not be prohibited.</p> <p>Waste Management agrees with the reasoning of the submitter insofar as it is inappropriate for a policy to prescribe an activity status.</p>	Allow
S211 Hutt City Council	S211.010	Concerned with the proposed prohibited activity status for unplanned greenfield development; considers that this precludes consenting pathways for development in unplanned greenfield areas which may have positive outcomes. Concerned that minor activities which extend into unplanned greenfield areas would be prohibited.	Support in part	<p>Waste Management agrees that unplanned greenfield development should not be prohibited. Waste Management seeks for unplanned greenfield development to be restricted as per its submission.</p> <p>Waste Management agrees with the submitter's comments and shares concerns</p>	Allow in part

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		Relief sought: (a) prohibiting avoiding unplanned greenfield development and for managing other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and.		about the preclusion of consenting pathways.	
S216 Te Rūnanga o Toa Rangatira (Te Rūnanga)	S216.005	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 non-urban areas. Amend WH.P2(a) to state: <u>restricting</u> 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.	Support	Waste Management agrees that unplanned greenfield development should not be prohibited. Waste Management agrees that clarity is needed in the application of the policy.	Allow
Policy WH.P16					
S33 Wellington City Council	33.048	Amend policy to allow for Discretionary activity status OR delete policy.	Support	Waste Management considers the policy should be amended to remove the reference to avoid and be replaced with minimise.	
S38 Summerset Group Holdings Limited	S38.009	Delete policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral	Allow in part

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
				position on whether the policy should be deleted.	
S96 Urban Edge Planning Group on behalf of M & J Walsh Partnership Ltd	S96.003	<p>Considers proposed policy too narrow due to lack of pathway other than avoidance. Considers effects could be managed.</p> <p>Amend policy to provide pathway where effects of additional stormwater discharged can be managed. Any further changes needed to achieve the intention of this submission.</p>	Support	Waste Management agrees with the submitters comments that the proposed policy by referencing 'avoid' is too narrow to allow other pathways to manage effects.	Allow
S97 Urban Edge Planning Group on behalf of Coronation Real Estate Limited	S97.002	Amend policy to provide pathway where effects of additional stormwater discharged can be managed. Any further changes needed to achieve the intention of this submission.	Support	Waste Management agrees that the focus should be on management of effects and that the focus on avoidance is not appropriate as it precludes pathways such as consent applications.	Allow
S110 Save Our Hills (Upper Hutt) Incorporated	S110.001	Do not allow any new stormwater discharges from unplanned greenfield development where the discharge will enter a surface water body or coastal water, including through an existing local authority stormwater network.	Oppose	<p>The Policy Framework should recognize that in some cases it is possible to mitigate adverse effects associated with stormwater discharge.</p> <p>Waste Management opposes the high level of restriction and prohibited status that flows from the policy for the reasons set out in Waste Management's primary submission.</p>	Disallow
S161 Gillies Group Management Ltd	S161.014	Delete Policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
S165 Pukerua Holdings Limited	S165.014	Delete Policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part
S169 Koru Homes NZ Limited	S169.009	Delete Policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part
S173 Arakura Plains Development Limited	S173.014	Delete Policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part
S177 Transpower New Zealand	S177.024	Considers the definition of unplanned greenfield development is too broad and uncertain. Unclear if all development is prohibited or just specific kinds of urban development. Concerns the approach could prohibit works on regionally significant infrastructure. Relief sought: Delete policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted. Waste Management agrees with the submitter's comments that this approach could prohibit the development of regionally significant infrastructure.	Allow in part
S206 Winstone Aggregates	S206.043	Delete policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part
S207 Firth Industries Limited	S207.016	Delete policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral	Allow in part

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
				position on whether the policy should be deleted.	
S211 Hutt City Council	S211.015	The policy duplicates WH.P2(a) and is therefore unnecessary. Delete policy.	Support in Part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part
S220 Rosco Ice Cream Ltd	S220.013	Amend to a minimisation policy.	Support	Waste Management considers the policy should be amended to remove the reference to avoid.	Allow
S236 Parkvale Road Limited	S236.008	Delete policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part
S241 Pukerua Property Group Ltd	S241.013	Withdraw Plan Change 1. If Plan Change 1 not withdrawn, delete objectives and policies using stormwater controls to manage or prevent land use. If objectives and policies are not deleted, they should be amended to remove avoidance principles and replaced with objectives and policies with same effect/guidance as remainder of Plan Change 1 before notification with perhaps some policy relief for activities that require consent under operative provisions (in force before Plan Change 1).	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management does not agree with complete deletion of Plan Change 1.	Allow in part
S245 Tama Potaka, Minister of Conservation	S245.014	Amend Policies to be consistent with New Zealand Coastal Policy Statement Policy 23.	Neutral	Waste Management does not have a position on the amendment proposed but Waste Management seeks the policy be further amended as per their primary submission.	Allow in part

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
S248 Ara Poutama Aotearoa the Department of Corrections	S248.024	Delete policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part
S252 Thames Pacific	S252.011	Delete policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part
S255 Woodridge Holdings Ltd	S255.030	Delete policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part
S251 Peka Peka Farm Limited	S251.007	Delete policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part
S257 Kāinga Ora	S257.021	Delete the policy. Alternatively, amend the proposed policy to provide a pathway where the effects from additional stormwater discharges can be managed appropriately. This alternative framework could also incorporate a set of criteria for out of sequence development, which is in line with the direction of the National Policy Statement-Urban Development.	Support in part	Waste Management agrees with the submitters comments regarding allowing a consenting pathway.	Allow in part
S261 Forest & Bird	S261.077	Retain as notified.	Oppose	As per Waste Management primary submission the approach to prohibiting activities is not supported.	Disallow

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
S286 Taranaki Whānui	S286.047	Delete the policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part
Rule WH.13					
S286 Taranaki Whānui	S286.077	Delete rule.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management supports the deletion of the rule as per its primary submission.	Allow
S261 Forest & Bird	S261.106	Retain as notified.	Oppose	As per Waste Management's primary submission the approach to prohibiting activities is not supported.	
S257 Kāinga Ora	S257.033	Delete rule. Alternatively, amend activity status and remove consequential requirement for separate Plan Change process, instead incorporating a set of criteria for out of sequence development that is in line with the National Policy Statement – Urban Development. Undertake review of, and expansion to the areas identified as planned/existing urban areas on maps 86- 89. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management supports the deletion of the rule as per its primary submission.	Allow
S255 Woodridge Holdings Ltd	S255.036	Amend so that unplanned greenfield developments areas are a discretionary activity.	Support	Waste Management consider the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management agrees with changing activity status if the rule is to remain.	Allow

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
S252 Thames Pacific	S252.018	Delete rule or if not accepted make a discretionary activity.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management supports the deletion of the rule as per its primary submission.	Allow
S251 Peka Peka Farm Limited	S251.009	Delete rule.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management support the deletion of the rule as per its primary submission.	Allow
S248 Ara Poutama Aotearoa the Department of Corrections	S248.037	Delete rule.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management supports the deletion of the rule as per its primary submission.	Allow
S247 Carrus Corporation Ltd	S247.019	Delete rule or if not accepted make a discretionary activity.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management supports the deletion of the rule as per its primary submission.	Allow
S245 Tama Potaka, Minister of Conservation	S245.052	Amend rules R2-R13 as appropriate to better give effect to New Zealand Coastal Policy Statement Policy 23(4) matters (a) – (d).	Neutral	Waste Management does not have a position on the amendment proposed but Waste Management seeks the policies and rules be further amended as per its primary submission.	Neutral
S243 Land Matters Limited	S243.030	Delete rule.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management	Allow

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
				supports the deletion of the rule per its primary submission,	
S239 Orogen Limited	S239.008	Reconsider Rules WH.R13 & P.R12, for example, through: -A revised activity status, or -Additional exclusions to the Rule.	Support	<p>Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management agrees with changing activity status if the rule is to remain.</p> <p>Waste Management agrees in some cases a consenting pathway will be appropriate and should not be precluded.</p>	Allow
S225 Upper Hutt City Council	S225.104	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.	Support	<p>Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management supports the deletion of the rule as per its original submission and agree with changing activity status if the rule is to remain.</p> <p>Waste Management agrees in some cases a consenting pathway will be appropriate and shouldn't be precluded.</p>	Allow
S220 Rosco Ice Cream Ltd	S220.016	Amend rule WH.R13 to be a non-complying activity.	Support	<p>Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management agrees with changing activity status if the rule is to remain.</p>	Allow
S216 Te Rūnanga o Toa Rangatira (Te Rūnanga)	S.216.006	Change to rule WH.R13 to classify the relevant activity as non-complying instead of prohibited.	Support	<p>Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management</p>	Allow

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
				agrees with changing activity status if the rule is to remain.	
S211 Hutt City Council	S211.022	Amend rule WH.R13 as follows: Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity. The use of land and the associated discharge of stormwater from impervious surfaces from unplanned greenfield development direct into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or proposed stormwater network, is a non-complying prohibited activity.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management agrees with changing activity status if the rule is to remain. If this amendment is made, Waste Management would support the amendment of the title to reflect the rule.	Allow
S207 Firth Industries Limited	S207.019	Inappropriate for all development in "unplanned greenfield development areas" to be prohibited activities due to insufficient evidence to substantiate that 'all' development will have significant adverse effects. Make discretionary activity.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management agrees with changing activity status if the rule is to remain.	Allow
S97 Urban Edge Planning Group on behalf of Coronation Real Estate Limited	S97.003	Replace the prohibited activity status with a discretionary or non-complying activity status. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management agrees with changing activity status if the rule is to remain.	Allow
S38 Summerset Group Holdings Limited	S38.017	Delete rule.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management supports the deletion of the rule as per its original submission.	Allow

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
S33 Wellington City Council	S33.067	Amend rule to discretionary or delete.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management supports the deletion of the rule as per its primary submission and agree with changing activity status if the rule is to remain.	Allow