

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)	Winstone Aggregates
Address for service: (Email, or physical address) Please note an <u>email address</u> is the preferred method	philip.heffernan@winstoneaggregates.co.nz
Phone: (Optional)	[REDACTED]
Contact person for submission: (If different to above)	Phil Heffernan
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	No
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:	Winstone is potentially affected by the content of the submissions that it is submitting on.

3. For the further submitter to action
<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: 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.</p>

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		1/03/2024
<p><u>Public information:</u> 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.</p>		

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: <ul style="list-style-type: none"> Suggested added text, shown as bolded text format Suggested deleted text, shown as struckthrough format

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

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: <i>Unique identifying number allocated to each specific submission point, located in the second column of the summary of decisions requested table:</i>	*Stance on the submission point: <i>(Support, Oppose, Oppose in part, Support in part, Not stated)</i>	*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. Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</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>
S258 BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies					
S258 BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	S258.004	Support	Allow	Winstone seeks to allow the amendment 'redevelopment' to include an additional exemption for "resurfacing that does not involve re-direction of existing stormwater flows or drainage networks".	Winstone agree with the proposed exclusion of resurfacing that does not alter existing stormwater flows. This would partially resolve some of the concerns raised in Winstone's original Submission Point S206.028.
S041 Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited					
S041 Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited	S41.002	Support	Allow	Winstone seeks to allow the deletion of Policy WH.P31.	Winstone agree with the concerns raised by the submitter which align with Winstone's original Submission Point S206.048.

S041 Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited	S41.005	Support	Allow	Winstone seeks to allow the deletion of clause (b) of Rule WH.R24.	Winstone agree with the concerns raised by the submitter which align with Winstone's original Submission Point S206.060. Note: The summary of the decision requested does not show the proposed deletion of clause (b).
S285 Civil Contractors New Zealand					
S285 Civil Contractors New Zealand	S285.003	Support in part	Allow in part	Winstone seeks to allow relief that Greater Wellington Regional Council provide further direction on appropriate locations and conditions for cleanfill sites. In addition, Winstone seek that this direction also be provided for quarrying activities.	Winstone agree with the general submission point. There is a lack of appropriate locations for both cleanfill and quarry sites throughout the Wellington Region. With increasing demand for aggregate resource, there must be appropriate provision for those activities in the Natural Resources Plan. Further detail on this point has been provided in Winstone's original submission.
S285 Civil Contractors New Zealand	S285.019	Support	Allow in part	Winstone seek to allow the relief sought that Policy WH.P29 is either deleted or amended to ensure appropriate exemptions are provided. Should policy be amended, Winstone seek that quarrying activities are specifically identified in the exemptions.	Winstone agree with the intent of the relief sought by the submitter which is the earthworks provisions must appropriately enable necessary activities to continue over the winter months. While Winstone support 'regionally significant infrastructure' being a qualifier for this, if the relief is accepted, Winstone seek that it also provides for other necessary

					activities including 'quarrying activities.
S219 Cuttriss Consultants Ltd					
S219 Cuttriss Consultants Ltd	S219.001	Support	Allow	Winstone seek to allow for relief and to insert a definition of 'greenfield development'.	Winstone agree with the concerns raised by the Submitter and that a definition for greenfield development is necessary. Winstone would support either the definition proposed by the Submitter, or the definition proposed by Winstone in original Submission Point S206.001.
S219 Cuttriss Consultants Ltd	S219.012	Support	Allow	Winstone seek that relief sought is allow and Policy WH.P31 is deleted.	Winstone support the proposed exclusion of resurfacing that does not alter existing stormwater flows. This would partially resolve some of the concerns raised in Winstone's original Submission Point S206.028.
S222 Environmental Defence Society Inc.					
S222 Environmental Defence Society Inc.	S222.022	Oppose	Disallow	Winstone seek that relief sought is not allowed and that the existing timeframe of 2100 is retained.	Winstone oppose reducing the timeframe. Winstone note that the direction of WH.O1 anticipates significant land use change to achieve that long term vision. This form of change must occur progressively over a long time period. Winstone support the existing timeframe of 76 years and notes that any reduction (including the Submitters proposed 26 years) will limit the ability to achieve the outcomes sought.

S222 Environmental Defence Society Inc.	S222.023	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose altering the timeframe to 2030. While Winstone support setting aspirational targets for meeting Target Attribute States, Winstone raises concern whether targets are realistically achievable. Winstone note that the improvements required through Plan Change 1 already require a significant land use change over a short time period (16 years). Notwithstanding Winstone’s concerns over whether the current targets can be realistically achieved (see Submission Point S206.034), reducing the time period (to 6 years) would require further significant land use change that is unlikely to align with community aspirations.
S222 Environmental Defence Society Inc.	S222.027	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose altering the timeframe to 2030. While Winstone support setting aspirational targets for meeting Target Attribute States, Winstone raises concern whether targets are realistically achievable. Winstone note that the improvements required through Plan Change 1 already require a significant land use change over a short time period (16 years). Notwithstanding Winstone’s concerns over whether the current targets can be realistically achieved (see Submission Point S206.034), reducing the time period

					(to 6 years) would require further significant land use change that is unlikely to align with community aspirations.
S222 Environmental Defence Society Inc.	S222.028	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose altering the timeframe to 2030. While Winstone support setting aspirational targets for meeting Target Attribute States, Winstone raises concern whether targets are realistically achievable. Winstone note that the improvements required through Plan Change 1 already require a significant land use change over a short time period (16 years). Notwithstanding Winstone's concerns over whether the current targets can be realistically achieved (see Submission Point S206.034), reducing the time period (to 6 years) would require further significant land use change that is unlikely to align with community aspirations.
S222 Environmental Defence Society Inc.	S222.031	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose altering the timeframe to 2030. While Winstone support setting aspirational targets for meeting Target Attribute States, Winstone raises concern whether targets are realistically achievable. Winstone note that the improvements required through Plan Change 1 already require a significant land use change over a short time

					period (16 years). Notwithstanding Winstone's concerns over whether the current targets can be realistically achieved (see Submission Point S206.034), reducing the time period (to 6 years) would require further significant land use change that is unlikely to align with community aspirations.
S222 (Environmental Defence Society Inc.)	S222.032	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose including reference to natural form and character in the objective. The restoration of natural character is not identified in the NPS-FM and is not appropriately measurable for the purpose of setting target attribute states. Restoration is also unlikely to be reasonably achievable.
S222 (Environmental Defence Society Inc.)	S222.034	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose including reference to natural form and character in the objective. The restoration of natural character is not identified in the NPS-FM and is not appropriately measurable for the purpose of setting target attribute states. Restoration is also unlikely to be reasonably achievable.
S222 Environmental Defence Society Inc.	S222.038	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose altering the timeframe to 2030. While Winstone support setting aspirational targets for meeting Target Attribute States, Winstone raises concern whether targets are realistically achievable. Winstone note that the

					improvements required through Plan Change 1 already require a significant land use change over a short time period (16 years). Notwithstanding Winstone's concerns over whether the current targets can be realistically achieved (see Submission Point S206.034), reducing the time period (to 6 years) would require further significant land use change that is unlikely to align with community aspirations.
S222 (Environmental Defence Society Inc.)	S222.057	Oppose	Disallow	Winstone seek that relief sought is not allowed and that the activity status for WH.R17 remains permitted.	Winstone oppose modifying the activity status. The permitted status, subject to the proposed conditions, will ensure that adverse effects are appropriately managed. Requiring consent for all vegetation clearance will result in unreasonable consenting cost and delay.
S222 (Environmental Defence Society Inc.)	S222.058	Oppose	Disallow	Winstone seek that relief sought is not allowed and that the activity status for WH.R18 remains controlled.	Winstone oppose modifying the activity status. The controlled activity status subject to the to the conditions and matters of control appropriately manage effects to erosion prone land while providing sufficient certainty to landowners. Increasing the activity status will result in further uncertainty and an unreasonably onerous consenting process.
S222 (Environmental Defence Society Inc.)	S222.063	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose increasing the setback. The setback provided in the notified rule is consistent with the setback for earthworks provided for

					in the operative NRP. It is unclear what setback is requested by the submitter, and what justification there is for any increased setback.
S261 Forest & Bird					
S261 Forest & Bird	S261.049	Oppose	Disallow	Winstone seek that relief sought is not allowed.	<p>Winstone oppose including reference to 'ephemeral watercourses'. The definition of 'ephemeral watercourse' in the NRP is very broad and would include gullies and indents in landscapes, all of which are not mapped or easily defined, making enforceability problematic. Winstone also questions how the health and wellbeing of ephemeral waterbodies will be measured due to their nature. Winstone note that ephemeral waterbodies from part of the wider river system and therefore their general function would already be anticipated in the current direction.</p> <p>Winstone oppose altering the timeframe to 2050. Winstone support the existing timeframe of 76 years and notes that any reduction (including the Submitters proposed 26 years) will limit the ability to achieve the outcomes sought.</p>
S261 (Forest & Bird)	S261.050	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose including reference to 'ephemeral watercourses'. The definition of 'ephemeral watercourse' in the NRP is very broad and would include gullies and indents

					<p>in landscapes, all of which are not mapped or easily defined. Winstone also questions the practicality of assessing target attribute states in systems that are temporary and changeable. Winstone note that ephemeral waterbodies from part of the wider river system and therefore their general function would already be anticipated in the current direction.</p> <p>Winstone oppose altering the timeframe to 2030. Winstone note that the improvements required through Plan Change 1 already require a significant land use change over a short time period (16 years). Notwithstanding Winstone's concerns over whether the current targets can be realistically achieved (see Submission Point S206.034), reducing the time period (to 6 years) would require further significant land use change that is unlikely to align with community aspirations.</p> <p>Winstone oppose including reference to natural form and character. The restoration of natural character is not identified in the NPS-FM and is not appropriately measurable for the purpose of setting target attribute states. Restoration is also unlikely to be reasonably achievable.</p>
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S261 (Forest & Bird)	S261.075	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose the replacement of “practicable” with “possible”. This would set an unreasonably high threshold for the reduction of adverse effects of stormwater runoff from existing urban areas.
S261 Forest & Bird	S261.090	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose increasing the setback. The setback provided in the notified rule is consistent with the setback for earthworks provided for in the operative NRP. It is unclear what setback is requested by the submitter, and what justification there is for any increased setback. Winstone oppose including reference to ‘ephemeral watercourses’. The definition of ‘ephemeral watercourse’ in the NRP is very broad and would include gullies and indents in landscapes, all of which are not mapped or easily defined. This would result in significant constraints for undertaking earthworks on any sloping land.
S261 Forest & Bird	S261.110	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose setting a setback for vegetation clearance. The setback provided in the notified rule is consistent with the setback for earthworks provided for in the operative NRP. It is unclear what setback is requested by the submitter, and what justification there is for any increased setback.

					Winstone oppose including reference to 'ephemeral watercourses'. The definition of 'ephemeral watercourse' in the NRP is very broad and would include gullies and indents in landscapes, all of which are not mapped or easily defined. This would result in significant constraints for undertaking earthworks on any sloping land.
S261 Forest & Bird	S261.116	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Setback will result in significant constraints for development within a site. Note that this includes ephemeral waterbodies which is very broad.
S261 (Forest & Bird)	S261.117	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose modifying the activity status. The restricted discretionary activity status subject to the to the conditions (notwithstanding Winstone's proposed changes) and matters of discretion appropriately manage effects. Increasing the activity status will result in further uncertainty and an unreasonably onerous consenting process.
S43 Fulton Hogan					
S43 Fulton Hogan	S43.007	Support	Allow	Winstone seek that relief sought is allowed and clause (b) is amended to replace "to a more natural level" to "in	Winstone support the proposed changes to the objective. Winstone agree that it is not clear on what the baseline for reducing sediment is to.

				comparison to the levels as at 1 November 2023".	
S238 Greater Wellington Regional Council					
S238 Greater Wellington Regional Council	S238.002	Support in part	Allow in part	Winstone seek that relief sought is allowed, subject to specific exclusion of quarrying zone (as a special purpose zone)	Winstone agree that it is ambiguous what is intended by 'urban zones' with relation to the definition of unplanned greenfield development. Winstone support an additional definition of urban zones. However, Winstone note that the proposed definition includes "special purpose zones" which would include quarry extractive zones. The definition does provide an exception for where it can be proved that the zone can be proved to be a rural zone, which a quarry zone would likely met, but to provide certainty Winstone seek that the definition be explicit that quarry zones are not urban zones.
S211 Hutt City Council					
S211 Hutt City Council	S211.007	Support	Allow	Winstone seek that relief sought is allowed and further consideration is given to whether the timeframe is realistically achievable.	Winstone fully support the submission. The Submitter has provided a robust assessment of the feasibility of meeting the 2040 timeframe. Winstone is concerned that this assessment was not provided upfront by Greater Wellington with the Section 32 evaluation. Winstone does raise that similar analysis should be undertaken by Greater Wellington for meeting all

					targets by the 2040 timeframe. Winstone note that the National Policy Statement for Freshwater require the long-term visions to be to be “ambitious <u>but reasonable</u> ” ¹ .
S211 Hutt City Council	S211.008	Support	Allow	Winstone seek that relief sought is allowed and further consideration is given to whether the timeframe is realistically achievable.	Winstone fully support the submission. The Submitter has provided a robust assessment of the feasibility of meeting the 2040 timeframe. Winstone is concerned that this assessment was not provided upfront by Greater Wellington with the Section 32 evaluation. Winstone does raise that similar analysis should be undertaken by Greater Wellington for meeting all targets by the 2040 timeframe. Winstone note that the National Policy Statement for Freshwater require the long-term visions to be to be “ambitious <u>but reasonable</u> ” ² .
S211 Hutt City Council	S211.009	Support	Allow	Winstone seek that relief sought is allowed and further consideration is given to whether the timeframe is realistically achievable.	Winstone fully support the submission. The Submitter has provided a robust assessment of the feasibility of meeting the 2040 timeframe. Winstone is concerned that this assessment was not provided upfront by Greater Wellington with the Section 32 evaluation. Winstone does raise that

¹ Clause 3.3(2)

² Clause 3.3(2)

					similar analysis should be undertaken by Greater Wellington for meeting all targets by the 2040 timeframe. Winstone note that the National Policy Statement for Freshwater require the long-term visions to be to be “ambitious <u>but reasonable</u> ” ³ .
S257 Kāinga Ora					
S257 Kāinga Ora	S257.004	Support	Allow	Winstone seek that relief sought is allowed and that “hydrological control” is further clarified.	Winstone support further clarification of hydrological control. Winstone agree that there is currently insufficient understanding of what a hydrological control is.
S257 Kāinga Ora	S257.028	Support	Allow	Winstone seek that relief sought is allowed and the impervious surface threshold is increased to 5000 m ² .	Winstone support the proposed increase to the impervious surface threshold. Winstone note that the threshold must reasonably anticipated appropriate redevelopment.
S286 Taranaki Whānui					
S286 Taranaki Whānui	S286.062	Support	Allow	Winstone seek that relief sought is allowed and Policy WH.P31 is deleted.	Winstone support the deletion of Policy WH.P31. Notwithstanding Winstone’s concerns as detailed in Original Submission Point S206.048, Winstone agree that managing the

³ Clause 3.3(2)

					timing of earthworks is best placed to a condition of consent.
S033 Wellington City Council					
S033 Wellington City Council	S33.024	Support	Allow	Winstone seek that relief sought is allowed and further consideration is given to whether the timeframe is realistically achievable.	Winstone support altering the timeframe to 2060. Winstone note that the National Policy Statement for Freshwater require the long-term visions to be to be “ambitious <u>but reasonable</u> ” ⁴ . Winstone consider that 2060 would meet this direction.
S033 Wellington City Council	S33.028	Support	Allow	Winstone seek that relief sought is allowed and further consideration is given to whether the timeframe is realistically achievable.	Winstone support altering the timeframe to 2060. Winstone note that the National Policy Statement for Freshwater require the long-term visions to be to be “ambitious <u>but reasonable</u> ” ⁵ . Winstone consider that 2060 would meet this direction.
S033 Wellington City Council	S33.031	Support	Allow	Winstone seek that relief sought is allowed and further consideration is given to whether the timeframe is realistically achievable.	Winstone support altering the timeframe to 2060. Winstone note that the National Policy Statement for Freshwater require the long-term visions to be to be “ambitious <u>but reasonable</u> ” ⁶ . Winstone consider that 2060 would meet this direction.
S033 Wellington City Council	S33.043	Support	Allow	Winstone seek that relief sought is allowed and that Policy WH.P10 is amended to reflect that the NRP only	Winstone agree with the submitter. The proposed changes are unnecessarily duplicating land use activities associated with stormwater.

⁴ Clause 3.3(2)

⁵ Clause 3.3(2)

⁶ Clause 3.3(2)

				manages the discharge and not the land use activities.	It is also questioned whether the management of land use is a function of the regional council under Section 30 of the RMA.
S151 Wellington Water Ltd					
S151 Wellington Water Ltd	S151.004	Support	Allow	Winstone seek that relief sought is allowed and further consideration is given to whether the timeframe is realistically achievable.	Winstone support altering the timeframe to 2060. Winstone note that the National Policy Statement for Freshwater require the long-term visions to be to be “ambitious <u>but reasonable</u> ” ⁷ . Winstone consider that 2060 would meet this direction.
S151 Wellington Water Ltd	S151.033	Support in part	Allow in part	Winstone seek that relief sought is allowed and that additional social, economic, cultural and environmental benefits are recognised.	Winstone support the proposed changes to the objective. Winstone note that there are additional social, economic, cultural and environmental benefits that should be recognised, including quarrying activities / regionally significant minerals.
S245 Tama Potaka, Minister of Conservation					
S245 Tama Potaka, Minister of Conservation	S245.001	Support	Allow	Winstone seek that relief sought is allowed and Objective WH.O1 is amended to replace “all freshwater bodies have planted margins” to “all freshwater bodies have vegetated margins where practicable”.	Winstone support the amendment to the objective. This aligns with relief sought by Winstone in Original Submission Point S206.032.

⁷ Clause 3.3(2)