

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



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

## Who can make a Further Submission?

A Further Submission may be made by any person who:

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

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

## How to make a Further Submission:

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

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

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

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


## Further Submission Form requirements:

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

1. Details of further submitter	
Name of Submitter: (First and last name, or organisation / company)	Gillies Group Management Limited
Address for service: (Email, or physical address) Please note an <u>email address</u> is the preferred method	C/- Scope Planning Stephanie@scopeplanning.co.nz
Phone: (Optional)	Insert
Contact person for submission: (If different to above)	Insert
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	No

make a similar submission:	
<b>2. Criteria applicable to Further Submitter:</b>	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	Yes
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
C) I am the local authority for the relevant area.	No
Specify the reasoning behind why you qualify for either of these above options:	Gillies Group Management Limited is a leading property developer with a number of existing and ongoing development interests throughout the Wellington Region.

<b>3. For the further submitter to action</b>
Service of your further submission: Please note that any person making a further submission <b>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.</b> Each submitter has an address for service available at: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a> . If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

<b>4. Disclosures:</b>		
If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation		29 February 2024
<b>Public information:</b> Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website. In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a> . You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a> .		

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

**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: Unique identifying number allocated to each specific submission point, located in the second column of the summary of decisions requested table:	*Stance on the submission point: (i.e. the further submitters stance on the original submission)	*Decision sought:  (Allow, Disallow, Allow in part, or Disallow in part)	Decision sought  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.	Reasons:  Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.
Upper Hutt City Council	S225.002	Support	Allow	Support submission point in full	Support this submission point that seeks a that GWRC undertakes a full legal and natural justice review of the provisions in light of the evolving national direction;
Upper Hutt City Council	S225.003	Support	Allow	Support submission point in full	Supports this submission point that seeks to amend the provisions to remove actions that conflict with or are more onerous than the 2023 National led government direction included in the Incoming Government Coalition agreements, November 2023 and letter from Chris Bishop dated 13 December 2023 which identifies changes to RMA, NPSFM, NESFW and NPS-IB prior to end of 2023.
Upper Hutt City Council	S225.006	Support	Allow	Support submission point in full	Support the need to amend the plan change to correctly implement national planning standards.
Upper Hutt City Council	S225.007	Support	Allow	Support submission point in full	Support the need to significantly amend the provisions which have a lack of higher

					order document direction or evidentiary support.
Upper Hutt City Council	S225.008	Support	Allow	Support submission point in full	Support the need to delete or significantly amend provisions which lack of any consideration of scale and significance and apply to all development without appropriate thresholds;
Upper Hutt City Council	S225.009	Support	Allow	Support submission point in full	Support the need to delete the addition of onerous requirements for existing consents;
Upper Hutt City Council	S225.014	Support	Allow	Support submission point in full	Support the need to delete provisions prohibiting urban expansion beyond existing urban zoned land, particularly where this does not align with recent rezoning notified before this plan change;
Upper Hutt City Council	S225.015	Support	Allow	Support submission point in full	Support the need to delete or significantly amend hydrological controls for all development, which are going beyond hydraulic neutrality, as these are unclear and seem to be overly onerous;
Upper Hutt City Council	S225.019	Support	Allow	Support submission point in full	Support the need to amend the proposed definition of a 'drain' that would result in all drains being considered 'modified streams'
Upper Hutt City Council	S225.023	Support	Allow	Support submission point in full	Agrees that there are fundamental issues with provisions requiring revision or deletion to ensure PC1 is reasonable, legally robust and practical to implement.
Upper Hutt City Council	S225.025	Support	Allow	Support submission point in full	Agrees with the concerns raised in relation to process, timing, and sequencing of aspects of the notified provisions of PC1. Agrees that there are numerous instances throughout PC1 where little regard to national policy direction and principles of natural justice have been considered and reasonableness /evidence base and practical implementation of provisions has been inconsistently applied.

Upper Hutt City Council	S225.026	Support	Allow	Support submission point in full	Agrees with the concerns raised that PC1 circumvents or undermines national directives. Concerned provisions will make urban development required by NPS-UD potentially impossible to deliver, through wrapping constraints around housing intensification direction.
Upper Hutt City Council	S225.032	Support	Allow	Support submission point in full	Agrees with the amendments sought to the definition of earthworks to reintroduce the exclusions.
Upper Hutt City Council	S225.046	Support	Allow	Support submission point in full	Supports the amendments sought to the definition of stormwater treatment system to provide flexibility.
Upper Hutt City Council	S225.048	Support	Allow	Support submission point in full	Supports amendments to the unplanned greenfield development map.
Upper Hutt City Council	S225.067	Support	Allow	Support submission point in full	Agrees with the amendments to Policy WH.P2 to seek that unplanned development is managed and not prohibited.
Upper Hutt City Council	S225.075	Support	Allow	Support submission point in full	Agree that the scope of Policy WH.P10 should be narrowed to apply only to stormwater networks not individual developments within a network, except for point source discharges to surface water.
Upper Hutt City Council	S225.077	Support	Allow	Support submission point in full	Agrees that is inappropriate and unjust to require onsite stormwater systems to be installed, due to the 'like for like' replacement of impervious surfaces. Considers this places unnecessary burden on land owners seeking to undertake maintenance of their properties.
Upper Hutt City Council	S225.078	Support	Allow	Support submission point in full	Agrees with the concerns raised in relation to financial contributions.
Upper Hutt City Council	S225.093	Support	Allow	Support submission point in full	Agrees with the request to delete Policy WH.P31 relating to winter works.

Upper Hutt City Council	S225.098	Support	Allow	Support submission point in full	Supports the request to delete or amend the thresholds and financial contributions specified in Rule WH.R6.
Upper Hutt City Council	S225.099	Support	Allow	Support submission point in full	Agrees with the concerns raised with the implications of this rule that would mean application of financial contributions and costly significant upgrades, given requirements to both include costly stormwater systems within developments, as well as pay financial contributions under schedule 30 (i.e. double dipping of cost).
Upper Hutt City Council	S225.100	Support	Allow	Support submission point in full	Agrees with the concerns raised with the implications of this rule that would mean application of financial contributions and costly significant upgrades, given requirements to both include costly stormwater systems within developments, as well as pay financial contributions under schedule 30 (i.e. double dipping of cost).
Upper Hutt City Council	S225.102	Support	Allow	Support submission point in full	Agrees with the concerns raised regarding the implications of the 'redevelopment' definition and lack of thresholds in Rule WH.R11 for redevelopment.
Upper Hutt City Council	S225.104	Support	Allow	Support submission point in full	Agrees with the concerns with the implications and practicality of Rule WH.R13.
Upper Hutt City Council	S225.120	Support	Allow	Support submission point in full	Agrees that the rationale and basis for the proposed financial contributions needs to be reviewed.
Upper Hutt City Council	S225.127	Support	Allow	Support submission point in full	Agrees that the erosion prone maps need to be amended to align with district council hazard mapping.
Upper Hutt City Council	S225.128	Support	Allow	Support submission point in full	Agrees that the erosion prone maps need to be amended to align with district council hazard mapping.

					Agrees that the erosion prone maps need to be amended to align with district council hazard mapping.
Porirua City Council	S240.010	Support	Allow	Support submission point in full	Agrees that the definition of hydrological control needs to be amended to assist in implementation of associated rules.
Porirua City Council	S240.014	Support	Allow	Support submission point in full	Supports amendments to the definition of unplanned greenfield development to provide a consenting pathway for a proposal located in these areas that may have positive outcomes, including for freshwater, housing supply and business zoned land.
Porirua City Council	S240.033	Support	Allow	Support submission point in full	Agrees that the prohibition of unplanned greenfield development may result in unintended consequences with no consenting pathway to consider a proposal located in this area that may have positive outcomes, including for freshwater, housing supply and business zoned land.
Porirua City Council	S240.046	Support	Allow	Support submission point in full	Agrees that Policy P.P15 should be deleted as there is insufficient evidence base to support the prohibition of unplanned greenfield development.
Porirua City Council	S240.060	Support	Allow	Support submission point in full	Agrees that the current approach to winter works management should be maintained and agrees that Policy P.P29 should be deleted.
Kāinga Ora	S257.009	Support	Allow	Support submission point in full	Agrees that a full review of and expansion to the areas identified as existing, new and future urban areas.
Kāinga Ora	S257.019	Support	Allow	Support submission point in full	Agrees that the policy and associated rules introduces a significant cost to developers on a site. Also agrees that Policy WH.P14 reads like a rule and would be difficult to achieve through redevelopment of existing



					urban environments and could discourage brownfield development.
Kāinga Ora	S257.020	Support	Allow	Support submission point in full	Agree that the policy and rules relating to financial contributions should be deleted.
Kāinga Ora	S257.021	Support	Allow	Support submission point in full	Agree that the policy and rules relating to unplanned urban development should be deleted as there is not sufficient evidence base to treat unplanned greenfield development differently to planned development.
Kāinga Ora	S257.026	Support	Allow	Support submission point in full	Agrees that winter works can be adequately dealt with as a matter of discretion or via current practice.
Kāinga Ora	S257.028	Support	Allow	Support submission point in full	Agrees that the 1,000m2 thresholds of this rule is a low baseline for development and will impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis.
Kāinga Ora	S257.029	Support	Allow	Support submission point in full	Agrees that the 1,000m2 thresholds of this rule is a low baseline for development and will impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis.
Kāinga Ora	S257.030	Support	Allow	Support submission point in full	Agrees that the 1,000m2 thresholds of this rule is a low baseline for development and will impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis.
Kāinga Ora	S257.031	Support	Allow	Support submission point in full	Agrees that WH.R11(b) does not provide alternative framework applicable to catchment based solutions for attenuation, control and treatment associated with "greenfield development", and doesn't allow for a corresponding reduction in cases where treatment exceeds the 85% requirement.

Kāinga Ora	S257.032	Support	Allow	Support submission point in full	Agrees with the removal of reference to financial contributions
Kāinga Ora	S257.038	Support	Allow	Support submission point in full	Agrees that winter works can be dealt with as a matter of discretion not a separate non-complying activity rule.
Kāinga Ora	S257.048	Support	Allow	Support submission point in full	Agrees that the financial contributions policy and associated rules should be deleted.
Kāinga Ora	S257.054	Support	Allow	Support submission point in full	Agrees that winter works can be dealt with as a matter of discretion not a separate non-complying activity rule.
Kāinga Ora	S257.056	Support	Allow	Support submission point in full	Agrees that the 1,000m2 thresholds of this rule is a low baseline for development and will impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis.
Kāinga Ora	S257.057	Support	Allow	Support submission point in full	Agrees that the 1,000m2 thresholds of this rule is a low baseline for development and will impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis.
Kāinga Ora	S257.058	Support	Allow	Support submission point in full	Agrees that the 1,000m2 thresholds of this rule is a low baseline for development and will impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis.
Kāinga Ora	S257.059	Support	Allow	Support submission point in full	Agrees that the 1,000m2 thresholds of this rule is a low baseline for development and will impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis.
Kāinga Ora	S257.064	Support	Allow	Support submission point in full	Agrees that an exclusion needs to be added to the earthworks permitted activity rule that exempts activities associated with the trenching of services.

Kāinga Ora	S257.065	Support	Allow	Support submission point in full	Agrees that winter works can be dealt with as a matter of discretion not a separate non-complying activity rule.
Kāinga Ora	S257.067	Support	Allow	Support submission point in full	Agrees that the policies, rules and schedules relating to financial contributions should be deleted.
Summerset Group Holdings Limited	S38.001	Support	Allow	Support submission point in full	Agrees that the definition of hydrological control needs to be amended to provide more specificity about what they actually are.
Summerset Group Holdings Limited	S38.002	Support	Allow	Support submission point in full	Agrees that roofing with rainwater collection complying with hydraulic neutrality rules should not be considered an impervious surface.
Summerset Group Holdings Limited	S38.007	Support	Allow	Support submission point in full	Agrees that the cost of the 85% treatment requirement on landowners/ developers, and the impacts on housing supply in the region has not been sufficiently assessed in the Section 32 Evaluation, it is potentially inconsistent with the NPS-UD.
Summerset Group Holdings Limited	S38.010	Support	Allow	Support submission point in full	Agrees that the s32 statement that there is a higher risk for discharges of sediment over the winter months is incorrect.