

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

1. Details of further submitter	
Submitter: (First and last name, or organisation / company)	Waka Kotahi NZ Transport Agency
Address for service: (Email, or physical address) Please note an <u>email address</u> is the preferred method	Attention: Evan Keating Private Bag 106602 Auckland 1143 <a href="mailto:environmentalplanning@nzta.govt.nz">environmentalplanning@nzta.govt.nz</a>
Phone: (Optional)	██████████
Contact person for submission: (If different to above)	Evan Keating
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:	Waka Kotahi NZ Transport Agency is a provider of nationally significant infrastructure which is impacted under PC1.

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: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a>.</p> <p>If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>

<b>4. Disclosures:</b>		
If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation		Date: 8 March 2024
<p><b>Public information:</b>          Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website.          In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a>.          You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a>.</p>		

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

<p><b>4. Further submission points</b></p> <p>Please complete the following table with details of which original submission points you support and/or oppose, and why.</p> <p><b>Refer Table below.</b></p>
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## Waka Kotahi – NZ Transport Agency Further Submission Wellington Natural Resources Plan

Submitter	Submission	Decision	Reason
S247 Carrus Corporation Ltd			
S247.006	Suggests the hydrological control definition should be expanded to include reference to the measures proposed to manage the flows and volumes and an acceptable solution that is easily and commonly able to be implemented.	Support	Changes propose include clarity of provisions.
S093 Centre Port Limited			
S93.001	Rule R26: Abrasive blasting outside an enclosed area. Reinstate the 'coastal' icon so that the rule applies in the coastal marine area.	Support	Waka Kotahi has infrastructure in the coastal environment.
S211 Hutt City Council			
Hutt City Council S211.006	Supports the 100 year vision towards full restoration of te-Whanganui-a-Tara's waterways. Seeks clarification on whether the text from "Note In the wai ora state..." is part of the objective or is an advisory note. Considers it is not physically possible for all water bodies to have planted margins, therefore seeks that the requirement for planted margins be qualified with "where possible".	Support	Changes proposed will improve clarity of the provisions.
S211.023	Rule WH.R23: Earthworks - permitted activity. Seeks that road maintenance be excluded from earthworks in the rule, noting that activities such as road resealing would otherwise unnecessarily require resource consent. [...]	Support	Changes proposed will improve clarity of the provisions.
S41 Chorus New Zealand Limited et al			
S41.002	Rule WH.R31: Change of rural land use - discretionary activity. Delete policy: This policy is linked to a rule which makes earthworks between June and September a non-complying activity.	Support	Winter works should be considered as a discretionary activity.
S41.004	Rule WH.R23: Earthworks - permitted activity. Suggests the 'and' after clause b means that any earthworks that are not related to farming activities require consent no matter how small but that this is most likely an error in how the rule is drafted and should be corrected.	Support	Changes proposed will improve clarity of the provisions.
S285 Civil Contractors New Zealand			

S285.008	Impervious surfaces definition. 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'. Reconsider the final two bullet points which have different approaches to permanent plumbing and use different terms for the same outcome (non-potable water use).	Support in part	Changes proposed will improve clarity of the provisions.
S285.010	Stormwater treatment system definition. Delete reference to 'green infrastructure'. Refer to 'contamination in stormwater', rather than 'stormwater contaminants.'	Support	Changes proposed will improve clarity of the provisions.
S285.016	Table 8.4: Target attribute states for rivers . Oppose. Visual clarity and deposited sediment need to be set taking into consideration all contributing sediment sources, and the following points also need to be addressed: 1. How sediment load reductions will be measured in the future 2. How would proportionate contribution to sediment be measured and any reduction in this contribution be measured 3. How much time would the testing take, and who would a 'suitable person' be to conduct the testing? If we do not currently have personnel capacity to conduct this testing, is it wise to write it into the Plan?	Support	Submission raises implementation matters which should be clarified.
S285.024	WH.R23 Amend Rule WH.R23 Earthworks. Reinstate the exemptions for certain earthworks activities as exist for 'other Whaitua', including for the thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines. Any consequential amendments, [...]	Support	Change will provide for infrastructure.
S248 Ara Poutama Aotearoa the Department of Corrections			
S248.005	Considers only in circumstances where residual adverse effects are more than minor should offsetting (or compensation) be required. Further, in circumstances where offsetting or compensation is required, applicants should not be bound to financial contributions, and should have an option to propose offsetting or compensation in line with Appendix 6 and Appendix 7 of the NPS-FM. Seeks the mandatory requirement for financial contributions as a condition of the rules is removed, but that the financial contributions regime proposed by PC1 continues to be provided for through PC1's policies, as an optional method alongside other offsetting or compensation methods provided for by NPS-FM. Submitter recognises the financial contributions method proposed by PC1 could	Support	Support if financial contributions remain part of NRP (noting Waka Kotahi submissions seek their removal).



	be an effective method of offsetting and should remain open as an option in circumstances where offsetting is required.		
S248.012	Amendment to restricted discretionary activity rule for earthworks, to recognise discharges of sediment are not included under permitted activity rule for earthworks (and are instead covered by the NRP's minor discharge rule R91).	Support	The change will provide clarity as to how provision relates to 5.2.12 All other discharges R91.
S248.023 and S248.047	Policy WH.P15 and Policy P.P14: Stormwater contaminant offsetting for new greenfield development. Considers policy be amended so that its consistent with effects management hierarchy set out in NPSFM, which requires aquatic offsetting or compensation is provided in circumstances where residual adverse effects are more than minor. Considers financial contributions should not be a mandatory means of providing aquatic offsetting, and resource consent applicants should have reasonable opportunity to provide aquatic offsetting or compensation in accordance with Appendix 6 or 7 of NPS-FM as part of proposals.	Support	Provision will provide consistency with NPS-FW.
S248.050	Policy P.P27: Management of earthworks sites. Modify policy to make more practicable.	Support.	Changes proposed will improve clarity of the provisions.
S248.060	Rule P.R11: All other stormwater discharges – non-complying activity. Considers the move to non-complying activity status for all other stormwater discharges is not clearly explained or justified in section 32 report. Concerned with the jump between permitted activity status for stormwater discharges under rules P.R2, P.R3, and P.R4, and non-complying activity status under this rule.	Support.	Support deletion of non-complying activity.
S248.066 and S248.043	Rule P.R24 and Rule WH.R25: Earthwork - noncomplying activity. Considers that the move to non-complying activity status for all other earthworks is not clearly explained or justified in the section 32 evaluation report. Non-compliance with conditions under rule P.R25 will trigger the non-complying activity rule.	Support	Support deletion of non-complying activity.
S248.073	12 Schedules D Calculation of level of contribution. Considers section D of schedule be amended to clarify the financial contribution is based on area of new impervious surface, not total area of development.	Support in part	Support if Waka Kotahi primary relief (deletion of financial contributions) not accepted.
S245 Tama Potaka, Minister of Conservation			
S245.001	Objective WH.O1: Questions the achievability of having planted margins in all waterbodies.	Support	Share concern regarding practicability of achieving WH.01
S245.002	Policy WH.P1: Improvement of aquatic ecosystem health. Add additional subclause (e) (both provisions).	Oppose	Clause (a) addresses this matter in conjunction with WH.P10.

S245.005 to S245.015	Policies WH.P6, WH.P8, WH.P9, WH.P10, WH.P11, WH.P12, WH.P13, WH.P14, WH.P15, WH.P16 and WH.P17.	Oppose	The changes sought are not specified (beyond being consistent with NZCPS Policy 23).
S245.018	Policy P.P1: Improvement of aquatic ecosystem health. Add additional subclause (e).	Oppose.	Clause (a) addresses this matter in conjunction with WH.P10.
S245.022, 245.023, 245.025, 245.026, 245.028, 245.029 S245.041, 245.048, 245.049, 245.051 S245.057, 245.063, 245.064, 245.066 and S245.074	Policies P.P6, P.P7, P.P9, P.P10, P.P12 and P.P13. Rules WH.R2, WH.R9, WH.R10 and WH.R12 Rules P.R2, P.R8, P.R9 and P.R11. Schedule 29: Stormwater Impact Assessments	Oppose.	The changes sought are not specified (beyond being consistent with NZCPS Policy 23).
S245.072	Method M40: Fish passage action plan programme [...]Requests the effectiveness of fish passage work be monitored and encourages the use of the Fish Passage Assessment tool and recent national guidance Considers an explanation of the Freshwater Fisheries regulations (1983) will help understand how the regulations work vis-à-vis the regional plan provisions.	Support.	Waka Kotahi supports the use of FPAT.
S222 Environmental Defence Society Inc			
S222.035 and S222.081	Policy WH.P2 and Policy P.P2. Seeks to amend (f) to require avoidance of significant adverse effects from earthworks, forestry and vegetation clearance activities.	Oppose	Use of avoidance is opposed.
S222.050 and S222.092	Policy WH.P29 and P.P27 Management of earthworks. Require setbacks.	Oppose	Relief lacks specificity to assess impact.
S222.063 and S222.105	Rule WH.R23: Earthworks and Rule P.R22 Earthworks. Considers greater setback from waterbodies and coastal marine area is required.	Oppose	Relief lacks specificity to assess impact.
S222.064	Rule WH.R24: Earthworks. Make a discretionary activity.	Oppose.	Earthworks effects and mitigation are well understood and are appropriate to address as a restricted discretionary activity.

S209 Enviro NZ Services Ltd (Enviro NZ)			
S209.003	Stormwater treatment system: Considers complete removal of contaminants is not always practical, depending on the contaminants, the treatment train and weather conditions. Relief: A device, structure or system used to <del>remove</del> <b>reduce</b> stormwater contaminants and/or...	Support.	100% treatment is not a feasible outcome for contaminant treatment.
S209.006 and S209.033	Policy WH.P6 and Policy P.P6 Notes clause (b)(i) requires all consent applications to have upgrades. Considers it inequitable to require upgrades for sites where suitable treatment is already in place and the target is met.	Support	Changes proposed will improve implementation of provisions.
S209.010	Policy WH.P10: Considers the imperative for hydrological control and WSUD measures should be removed, as they are not always required.	Support	Changes proposed will improve implementation of provisions.
S188 Wellington Fish and Game Regional Council			
S188.012	General comments - stormwater management: Requirement for demonstrating functional need, and the effects management hierarchy should be included to bring the Plan into alignment with current national directives.	Oppose.	Relief lacks specificity to assess impact.
S188.064	Policy WH.P29: Management of earthworks. Seeks increased measures to control sediment inputs into waterways.	Oppose.	Relief lacks specificity to assess impact.
S193 Wairarapa Federated Farmers			
S193.067	Policy WH.P1: Improvement of aquatic ecosystem health. Recommends changes for a more strategic and prioritised approach	Support.	Prioritisation will be necessary given the scale of works required.
S193.119	Policy P.P1: Improvement of aquatic ecosystem health. Recommends changes for a more strategic and prioritised approach	Support.	Prioritisation will be necessary given the scale of works required.
S261 Forest & Bird			
S261.015	Considers additional objectives are required to meet NPSFM requirements.	Oppose	Relief lacks specificity to assess impact.
S261.038	Rule R145: All other uses of river and lake beds - discretionary activity. Considers prohibited activity status provides most certainty to achieve the policy direction of the NPSFM and RMA, including protection of fish passage. Make placement of passive gates prohibited (i.e., strengthen rule beyond NES minimum).	Oppose.	Oppose due to lack of s32 assessment and a discretionary activity status is appropriate.
S261.044	Considers prioritisation of areas for restoration of fish passage should be based on both species present in the catchment, as well as the area and quality of the	Support.	Consider wording could be improved grammatically.

	habitat that would become available, noting that providing access for valuable species to poor habitat may be less effective than restoring access to higher quality habitat elsewhere.		
S261.050, S261.133 and S261.134	Objective WH.O2, Objective P.O1, Objective P.O2 Seeks reference to ephemeral watercourses.	Oppose.	The RMA defines “river” as being continually or intermittently flowing body of freshwater The NPS-FW and NES-FW include provisions for the management of permanent and intermittent rivers and streams. These provisions do not extend to ephemeral streams.
S261.067 and S261.147	Policy WH.P5 and Policy P.P5: Localised adverse effects of point source discharge. Considers the policy too narrow, noting it repeats matters from RMA s70, which is not limited to point sources discharges. Seeks the policy is broadened to capture all discharges.	Oppose	Oppose if policy is determined to apply to state highway network discharges.
S261.091 and S261.170	Policy WH.P30 and Policy P.28: Discharge standard for earthworks. Considers controls on deposited sediment are also required.	Oppose.	Changes in sediment depth may have a range of causes including natural movement of sediment.
S261.102 and S261.180	Rule WH.R9 and Rule P.R8: Stormwater from a local authority or state highway network restricted discretionary activity. Reclassify as a discretionary activity rule	Oppose	Effects can be appropriately managed via RDA status.
S261.103 and S261.104	Rule WH.R10 and Rule WH.R11. Considers clause (c) and (b) (financial contributions) respectively do not reflect the effects management hierarchy.	Oppose in part.	Financial contributions can be taken to provide off site 'offset' mitigation.
S261.111 and S261.188	Rule WH.R18 and P.R17: Vegetation clearance. Reclassify as a discretionary activity	Oppose	Effects can be appropriate managed via permitted activity status (per Waka Kotahi primary submission relief).
S261.116 and S261.193	Rule WH.R23 and Rule P.R22: Earthworks - permitted activity. Considers a 5m setback is insufficient to protect ecosystems and maintain water quality. Considers ephemeral watercourses should be referred to as they have ecological value and can reduce contaminant loads when protected.	Oppose.	The RMA defines “river” as being continually or intermittently flowing body of freshwater The NPS-FW and NES-FW include provisions for the management of permanent and intermittent rivers and streams. These



			provisions do not extend to ephemeral streams.
S261.117 and S261.194	Rule WH.R24 and Rule P.R23: Earthworks - restricted discretionary activity. Reclassify as a discretionary activity rule.	Oppose	Effects can be appropriate managed via RDA status.
S261.151	Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives. Seeks additional toxicants are referred to.	Oppose	<i>Toxicants</i> has too broad a meaning and contaminants of concern are already identified.
S261.180 and S261.181	Rule P.R9 and Rule P.R10. Considers clause (c) and (b) (financial contributions) respectively do not reflect the effects management hierarchy.	Oppose in part.	Financial contributions can be taken to provide off site 'offset' mitigation.
S043 Fulton Hogan Ltd			
S43.014 and S43.026	Rule WH.R1 and P.R1: Point source discharges of specific contaminants - prohibited activity. Seeks greater flexibility in the rule to avoid perverse outcomes.	Support	Will allow for maintenance activities where appropriate environmental controls are in place.
S43.018	Alter Rules WH.R23, WH.R24 and WH.R25 to provide for low level activities, rather than requiring a non-complying activity status consent for all earthworks between 1 June and 30 September where any run-off occurs. This could be provided alongside additional oversight and control of erosion and sediment control plans by Council so that Council has additional certainty over the measures and mitigation proposed	Support	A more permissive activity status reflecting actual effects and known mitigation is appropriate.
S258 BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies			
S258.004	Interpretation Redevelopment. Seeks exclusion for resurfacing that does not involve re-direction of existing stormwater flows or drainage networks, for minor works to paved surfaces that may not fall into one of the other categories of excluded activities, but which will not alter existing stormwater flows or volumes.	Support	Will assist with the provision of regionally significant infrastructure.
S258.031	Policy P.P6: Point source discharges. Considers policy be deleted due to uncertainty and inappropriateness.	Support if Waka Kotahi primary relief not granted.	Support if Waka Kotahi primary relief not granted.
S258.038	Rule P.R1: Point source discharges of specific contaminants - prohibited activity. Considers this potentially creates a requirement that all discharges from roads must be directed via an interceptor system for treatment, which would be a significant undertaking and is not expected to be the case. Considers rule	Support.	Changes proposed will improve clarity of provisions.

	unnecessary, may result in unintended and inappropriate outcomes and should be deleted.		
S258.044	Rule P.R22: Require implementation of best practice erosion and sediment control measures to reduce the risk of sediment becoming entrained in stormwater. Amend Rule P.22(c)(iv) and (v) to focus on implementation of best practice erosion and sediment control measures rather than the absolute avoidance approach currently proposed. T	Support.	Current wording requires 'no discharge' (P.R22(c)(iv)) and 'prevent a discharge' (P.R22(c)(v)) which is likely unachievable.
S258.045	Amend Rule P.R23, to focus on implementation of best practice erosion and sediment control measures rather requiring compliance with a sediment loading threshold.	Support.	Change focuses on best practice mitigation.
S258.049	Amend Schedule 28 to clearly enable source consent and/or other contaminant management measures to be used as an alternative means of achieving the target load reductions; and make all necessary amendments to clarify the assessment pathway (including the applicable rules) for activities that cannot achieve the copper and zinc target load reductio	Support.	Changes proposed will improve clarity of provisions.
<b>S257 Kainga Ora</b>			
S257.010 and S257.039	Objective WH.O1 and Objective P.O1: Seeks outcomes across PC1 to ensure the Plan Change does not extend beyond that necessary to implement the NPS-FM, noting the considerable additional regulatory burden such a framework imposes upon a range of stakeholders. Includes Consequential changes sought where relevant to reconcile outcomes to changes sought in specific rules.	Support	Provides consistency with national planning direction.
S257.027	Rule WH.R2: Stormwater to land - permitted activity. Clarify that soak pits are permitted	Support	Changes proposed will improve clarity of provisions.
S257.031	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity. Reframe as a RD activity status	Support	Effects can be appropriately managed via RDA status.
S257.054	Policy P.P29: Winter shut down of earthworks. Opposes this policy and the non-complying rule framework. Considers winter works can be adequately considered as a listed matter of discretion within a RDA rule, with conditions being placed accordingly to manage works during this period. Considers the framework lacks real-world practical application. Delete the policy and consequential changes to WH.P29 and the related rule framework.	Support	Winter works can be more appropriately managed through a consent process.
S257.055	Rule P.R2: Stormwater to land - permitted activity. Clarify rule such that soak pits are permitted.	Support	Changes proposed will improve clarity of provisions.
S257.066	Rule P.R24: Earthworks - noncomplying activity. Delete P.R24 with consideration of winter works being a listed matter of discretion under P.R23.	Support	Winter works can be more appropriately managed through a consent process.
S257.072 to S257.077	Maps 90 to 95: Highest and high erosion risk land. Delete maps and provide a definition for 'High and Highest Erosion Risk Land' to more accurately capture such sites which are then subject to the associated rules.	Support	Support subject to definitions being clear.

S240 Porirua City Council			
S240.024	Objective P.O1: The health of Te Awarua-o-Porirua's groundwater ... Considers it unclear if the text from "Note In the wai ora state..." forms part of the objective or it is some form of explanatory/advisory note. If it does form part of the objective, seeks the deletion of the word "note". Considers it is not possible for waters to be in a natural state without the full restoration of the catchment to a pre-human state which is not the intention of this Plan Change, suggest that a qualifier is needed that waters are restored where possible	Support.	Changes propose include clarity and implementation of objective.
S31 Stormwater 360			
S31.005	Table 9.2: Target attribute states for rivers. Target attribute states refer to dissolved metals concentration whereas Schedule 28 (Table 1 and Table 2) refer only to the percentage of Copper or Zinc to be removed. Suggest consistency throughout rules/policies. Relief: Define speciation throughout stormwater rules to achieve TAS defined in Table 8.4. Table 1 and 2 of Schedule 28: Stormwater Contaminant Treatment should reflect dissolved metals.	Support	Changes proposed will improve clarity of provisions.
S31.003 and S31.007	Table 8.4: Target attribute states for rivers And Table 1: Target load Reductions for Copper and Zinc. Suggests target load reductions are unrealistic and questions where the 90% removal via bioretention comes from and why TSS isn't considered under the schedule. Relief not stated.	Support	Support concern on target load reductions being achievable.
S177 Transpower New Zealand Limited			
S177.003	Define the term "greenfield development", and that this term must exclude the operation, maintenance, upgrading, or development of regionally significant infrastructure'.	Support	Changes proposed will improve clarity of provisions.
S177.014	Considers it necessary to exclude the maintenance, upgrading or development of regionally significant infrastructure from any definition of "greenfield development".	Support	Changes will support delivery of regionally significant infrastructure.
S177.018	Objective WH.O1: Considers restoration of natural character in relation to all freshwater bodies and coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure is located over or within freshwater bodies or the coastal marine area. Achieving restoration of natural character implies existing regionally significant infrastructure may need to be removed, and new regionally significant infrastructure may be inappropriate. ... In the wai ora state: Āhua (natural character) is restored <b>to the extent that this is possible</b> , and freshwater bodies exhibit their natural quality, rhythms, range of flows, form, hydrology and character...	Support	Changes will recognise existing regionally significant infrastructure located over or within freshwater/CMA.



S177.025	Policy WH.P29: Management of earthworks: support changes to manage actual or potential adverse effects, to seek uncontrolled loss of soil and sediment from site is minimised rather than requiring all soil and sediment to be retained on site and qualify clause (b) with "where practicable".	Support	Changes propose include clarity of policy.
S177.041	Rule WH.R23: Earthworks - permitted activity. Considers that given minor discharges rule provides for discharge of suspended solids, condition (h) be amended to reflect purpose of erosion and sediment control is to prevent uncontrolled discharge of sediment, rather than all discharge of sediment.	Support	Changes reflect practical implementation of sediment control methodology.
S177.044	Objective P.O1 Considers the objective should acknowledge complete restoration of character may not be possible in all instances, particularly as it relates to regionally significant infrastructure. ... Te Awarua-o-Porirua is a taonga of Ngāti Toa Rangatira and must be respected by others Mauri is restored and waters are in a natural state, <b>to the extent that this is possible...</b>	Support.	Changes will recognise existing regionally significant infrastructure located over or within freshwater/CMA.
S177.051	Policy P.P27: Management of earthworks sites. Support changes to manage actual or potential adverse effects, to seek uncontrolled loss of soil and sediment from site is minimised rather than requiring all soil and sediment to be retained on site and qualify clause (b) with "where practicable".	Support	Changes proposed include clarity of policy.
S177.072	12 Schedules, A Content. Support changes in Transpower's first and third paragraphs (of submission point), oppose new (second) paragraph (... <b><u>The creation of impervious surfaces through new greenfield development, new roads (not directly associated with a greenfield development) and state highways will result in an increase of stormwater contaminants entering freshwater receiving environments. Stormwater contaminant treatment will be required of new development proposals, however, treatment of contaminants is only practicable for a portion of the contaminant load received from the site. This results in a residual contaminant load still entering freshwater and coastal water receiving environments.</u></b> )	Oppose in part, support in part.	The second proposed paragraph is not necessary to provide for NPS-FW based compensation. The first and third paragraphs as supported.
S177.073	Schedule 30 B Purpose: Various changes to give applicants a reasonable opportunity to undertake their own aquatic offsetting or compensation to address more than minor residual adverse effects and that NPS-FM only requires offsetting or compensation in circumstances where residual adverse effects are more than minor.	Support	Changes support national policy direction
S177.075	Schedule 30 D Calculation of level of contribution: Amend to clarify the financial contribution is based on area of new impervious surface, not total area of development.	Support	Support if Waka Kotahi relief (to remove Schedule 30) is not granted.
S225 Upper Hutt City Council			
S225.019	Amend proposed definition of a 'drain' that would result in all drains being considered 'modified streams';		Changes proposed will improve clarity of the provisions.

S151 Wellington Water Ltd			
S151.002	General submission point: Amend rules for stormwater and wastewater discharges from the local authority networks (and/or the associated Schedules) so that they refer to objective information requirements rather than inviting a detailed assessment against the schedules to determine activity status; and All amendments necessary (including disappling rules in other parts of the NRP) to ensure that the wastewater and stormwater from local authority networks remain a restricted discretionary activity, and the associated rules in PC1 function as a 'one stop shop' in the relevant whaitua. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Support	Waka Kotahi will be subject to the same provisions relative to stormwater network discharge consents.
S151.006 to S151.009, S151.011	General comments - water bodies, target attribute states, stormwater management	Support	The submission highlights limitations which to some aspects of PC1.
S151.015	Seeks all changes to PC1 that are necessary to give effect to changes to the NPS-FM or its application, should such changes be progressed while PC1 is being considered.	Support	The submission will enable a responsive approach to signalled NPS-FW changes.
S151.055	Objective WH.O2: Seeks the timeframe be altered to 2060 as the 2040 timeframe will render prioritisation of sub-catchments for improvement or upgrade meaningless and 17 years is considered insufficient to achieve required outcomes. Supports the intent of measurable progress in clause (a). Considers clause (b) should have a maintenance component, rather than just improvement and there should be a comma after 'stability'. Considers clauses (f) and (g) need to be combined or better distinguished.	Support	Proposed changes generally improve implementation of objective.
S151.057	Table 8.1 Coastal water objectives. Alter timeframe to 2060 and Withdraw table until further detail in relation to the baseline states and required timeframes can be added. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Support	Table 8.1 lacks the required information to set baseline states for the Coastal Water Management Units to assess whether the state is being maintained or improved.
S151.061, S151.063, S151.064, S151.065 and S151.069	Table 8.4: Target attribute states for rivers. Provide further information on the baseline state, and a detailed assessment of the implications of the TAS provisions.	Support	Waka Kotahi will be subject to the same provisions relative to stormwater network discharge consents and river environs.
S151.068	Table 8.4: Target attribute states for rivers. Dissolved copper/dissolved zinc Considers the approach of Policy P.P9 does not recognise the other sources of zinc and copper outside of WWL's control (e.g. zinc roofs, copper based brake discs). Considers the required changes will require an approach outside of	Support.	Share concern regarding technical feasibility of achieving targets specified.



	WWL's control that will take years and significant investment to enact, and may not have occurred by 2040. Notes the TAS is for dissolved copper and dissolved zinc can be more challenging to remove through stormwater treatment devices than total copper and total zinc.		
S151.073	Policy WH.P2: Amend policy, including clause (b), to state that redevelopment in existing urban will be <i>encouraged</i> noting this provides opportunities to reduce the existing contaminant load, and redevelopment will be required to reduce the existing contaminant load.	Support	Waka Kotahi will be subject to the same provisions relative to stormwater network discharge consents.
S151.076	Table 8.5: Sediment load reductions required to achieve the visual clarity [...]. Set TAS for visual clarity and deposited sediment by taking into consideration all contributing sediment sources, and address the following points: [...]	Support	Waka Kotahi will be subject to the same provisions relative to stormwater network discharge consents.
S151.077	Policy WH.P6: Cumulative adverse effects of point source discharges. Amend policy so the exclusion of stormwater and wastewater is explicit.	Support	Waka Kotahi will be subject to the same provisions relative to stormwater network discharge consents.
S151.082	Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy. Proposes substantial changes to policy.	Support in part.	Some of the range of proposed changes generally improve implementation of policy.
S151.127	Rule P.R8: Stormwater from a local authority or state highway network restricted discretionary activity. Proposes substantial changes to rule.	Support in part.	Some of the range of proposed changes generally improve implementation of rule.
S151.139 to S151.156	Schedule 31: Stormwater Management Strategy - Te Whanganui-aTara and Te Awarua-o-Porirua.	Support.	Changes proposed will improve clarity of the provisions.
S151.090	Rule WH.R1: Point source discharges of specific contaminants - prohibited activity. Add new clause to the end of the existing rule as follows:... <b>Noting that this rule does not apply to the discharge of contaminants collected as part of stormwater management as a result of precipitation or part of the operation of the wastewater network.</b> Or alternative relief.	Support	Changes proposed will improve clarity of the provisions.
S151.096	Rule WH.R9: Stormwater from a local authority or state highway network. Provisions to be revised as follows: [...]	Support	Changes proposed will improve clarity of the provisions.
S151.100	Rule WH.R24: Earthworks. Provide an exemption for Regionally Significant Infrastructure to reflect the volume of work that needs to be undertaken for RSI	Support	Waka Kotahi provides RSI.
S151.104	Table 9.1: Coastal water objectives. Table lacks the required information to set baseline states for the Coastal Water Management Units to assess whether the state is being maintained or improved and lacks timeframes for when the	Support	Waka Kotahi will be subject to the same provisions

	baseline will be determined. Withdraw the table until the further detail can be added.		relative to stormwater network discharge consents.
S151.107	Table 9.2: Target attribute states for rivers. Provide further information on the baseline state, and a detailed assessment of the implications of the TAS provisions on a sub-catchment basis. Alter timeframe to 2060. Include guidance on how to measure the proportion from WWL's networks with inputs from other sources within the catchment. Withdraw the table until the further detail can be added.	Support	Waka Kotahi will be subject to the same provisions relative to stormwater network discharge consents.
S151.109	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives. Seeks a range of changes to, among other things, provide clarification how the FAP provisions will work alongside existing TAS provisions, network discharge consent provisions, and in particular Schedules 31 and 32. Provide clarity over relationship between 'non-regulatory methods' and 'work programmes'. Amend policy to the extent necessary to appropriately reflect these interrelationships.	Support	Waka Kotahi will be subject to the same provisions relative to stormwater network discharge consents.
S151.112	Table 9.4: Part Freshwater Management Unit sediment load. Considers a detailed assessment of the implications of the TAS provisions is required on a sub-catchment basis to determine appropriateness of the requirements and 2040 timeframes, and implications for sub-catchment prioritisation [...] Furthermore, sediment loads, visual clarity and deposited sediment are influenced by factors within catchments outside of WWL's control including human land uses and activities and natural factors.	Support	Waka Kotahi will be subject to the same provisions relative to stormwater network discharge consents.
S151.113	Policy P.P6: Point source discharges. Amend policy to ensure the exclusion of stormwater and wastewater needs to be explicit.	Support	Changes proposed will improve clarity of the provisions.
S151.116	Policy P.P12: Managing stormwater network discharges [...]. Proposes a wide range of changes to policy.	Support	Changes proposed will improve clarity of the provisions.
S151.123	Rule P.R1: Point source discharges of specific contaminants - prohibited activity. Add new clause to the end of the existing rule as follows: ... <b>Noting that this rule does not apply to the discharge of contaminants collected as part of stormwater management as a result of precipitation or part of the operation of the wastewater network.</b> Or alternative relief.	Support	Changes proposed will improve clarity of the provisions.
S151.127	Rule P.R8: Stormwater from a local authority or state highway network restricted discretionary activity. Proposes a wide range of changes to policy.	Support	Changes proposed will improve clarity of the provisions.
S151.131	Rule P.R23: Earthworks. Provide an exemption to (b) for RSI.	Support	Waka Kotahi provides RSI.
S151.133 to S151.156	Range of amendments to Schedule 31. Support in part as relevant to State highway network discharges.	Support	Changes proposed will improve clarity of the provisions.

S206 Winstone Aggregates			
S206.006	Insert new definition of "aquatic offset" as follows: Aquatic offset Has the same meaning as in the National Policy Statement for Freshwater Management (as set out below): ...	Support	Support consistency with NPS-FW
S206.007	Insert new definition of "aquatic compensation" as follows: Aquatic compensation Has the same meaning as in the National Policy Statement for Freshwater Management (as set out below): ...	Support	Support consistency with NPS-FW
S206.023	Interpretation Earthworks: Seeks for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua to include all exemptions provided in the existing definition of earthworks. Notes the use of "and" implies all earthworks exclusions are conjunctive and seeks clarification that the exclusions are disjunctive through the use of "or". Supports clarification provided to exemption clause (i) of the existing definition.	Support	Exclusion will clarify repair and maintenance ((d) and (g) of proposed) is able to be undertaken.

**Further Submitters to be served:**

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