

Submission on Plan Change 1 to the Natural Resources Plan

Clause 6 of First Schedule, Resource Management Act 1991

Attention: Natural Resources Plan – Planning Team

Email: regionalplan@gw.govt.nz

Submitter: CentrePort Limited

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1 Introduction

This is a submission on Plan Change 1 to the Natural Resources Plan. Plan Change 1 includes objectives and policies, rules and other methods to manage activities such as earthworks, stormwater discharges including from new urban development, wastewater discharges, and rural land use to achieve water quality and ecological health objectives within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.

2 CentrePort's Submission

CentrePort's submission on Plan Change 1 is provided in **Attachment A**. CentrePort would welcome the opportunity to discuss any of the matters raised in its submission with Council staff prior to hearings.

CentrePort **could not gain** an advantage in trade competition through this submission.

CentrePort **wishes to be heard** in support of this submission.

If others make a similar submission, **we will consider** presenting a joint case with them at the hearing.



William Woods
Strategic Planning Manager

Date 14 December 2023

Attachment A: Detailed submission


Deletions are marked with ~~strikethrough~~ and additions with underline.


Sub #	Plan provision	Support/oppose/amend	RMA process	Reasons for submission	Decision sought
	<p>Rule R26: Abrasive blasting outside an enclosed area – permitted activity</p> <p>The discharge of contaminants into air from dry or wet abrasive blasting outside an enclosed area is a permitted activity, provided the following conditions are met:</p> <ol style="list-style-type: none"> the discharge shall not cause noxious, dangerous, offensive or objectionable odour, dust, particulate, smoke, vapours, droplets or ash beyond the boundary of the property, and the operation of a mobile abrasive blasting unit used at one property is no more than 10 days in any 12 month period (except for abrasive blasting of the National Grid), and abrasive blasting shall only be undertaken when it is impracticable to remove or dismantle or transport a fixed object or structure to be cleaned in an abrasive blasting booth, and if the blasting is dry abrasive blasting, the blasting materials shall only be garnet, sodium bicarbonate, crushed glass, or agricultural materials including crushed corn cobs or walnuts, and if the blasting is wet abrasive blasting, the blasting shall only use water, and the free silica content of a sample of the blasting material shall not exceed 5% by weight, and all work areas and surrounding areas are kept clean and substantially free of accumulations of deposited material and other debris. 	Oppose	Part 1 Schedule 1	<p>Plan Change 1 amends this rule so that it no longer applies in the Coastal Marine Area.</p> <p>The s32 report states that <i>'These rules have been identified as inappropriate for permitted activity status in the coastal marine area. The activities are unsuitable and potentially detrimental to the coastal marine area. Given there is no precedent or demand for these activities to occur within the coastal marine area the retention of the coastal icon is unnecessary.'</i></p> <p>CentrePort disagrees that there is 'no precedent or demand' for these activities and that it is unsuitable for this rule to apply to the coastal marine area, particularly within the Commercial Port Area. Lack of precedent or demand also is not appropriate justification for amending the rule so that it doesn't apply in this area.</p> <p>Abrasive blasting of coastal structures such as wharves, and cranes is commonplace and is important for maintaining these structures in good condition. CentrePort previously held a consent for abrasive blasting in the CMA (consent was required because the activity was proposed for more than 10 days in a year). The permitted activity standards provide suitable controls for these activities, and where the controls are not met, it is appropriate that a different activity status applies.</p>	Reinstate the 'coastal' icon so that the rule applies in the coastal marine area.
	<p>Rule R27: Handling of bulk solid materials – permitted activity</p> <p>The discharge of contaminants into air from the handling of bulk solid materials including from the activities of quarrying, mining, cleanfilling, blasting, extraction, crushing, screening, processing, stockpiling, handling, conveying, sorting, and storage is a permitted activity, provided the following conditions are met:</p> <ol style="list-style-type: none"> for the Commercial Port Area shown on Map 51 and Map 52 any discharge into air shall not cause noxious, dangerous, offensive or objectionable odour, dust, particulate, smoke, vapours, droplets or ash beyond the boundary of the Commercial Port Area on Map 51 and Map 52, and for all other areas, the discharge shall not cause noxious, dangerous, offensive or objectionable odour, dust, particulate, smoke, vapours, droplets or ash beyond the boundary of the property. <p><i>Note</i></p>	Support	Part 1 Schedule 1	<p>This provision was previously identified as a coastal activity, but this designation has been removed. CentrePort supports this change as it more accurately applies the provision to land-based activities in the Commercial Port Area.</p>	Retain as proposed.

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	<p>In relation to (b) above, all other areas include the Operational Port Area as defined in the Wellington City District Plan outside the Commercial Port Area as defined on Maps 51 and 52.</p>																																																																																																																																																																																																																																																																																																																																																																																																																																				
	<p>Objective WH.O3 The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved to achieve the coastal water objectives set out in Table 8.1, and by 2040:</p> <p>a) sediment inputs into Mākara Estuary are reduced, and b) high contaminant concentrations, including around discharge points, are reduced, and c) diversity, abundance, composition, structure and condition of mahinga kai species and communities has increased, and d) huanga of mahinga kai and Māori customary use for locations identified in Schedule B (Ngā Taonga Nui a Kiwa) are maintained or improved, and e) the extent and condition of estuarine seagrass, saltmarsh and brackish water submerged macrophytes are increased and improved to support abundant and diverse biota, and f) coastal areas support healthy functioning ecosystems, and their water conditions and habitats support the presence, abundance, survival, and recovery of At-risk and Threatened species and taonga species, and g) mana whenua can safely connect with the coastal marine area and enjoy a wider range of customary and cultural practices, including mahinga kai gathering and tauranga waka, and h) mana whenua and communities can safely connect with the coastal marine area and enjoy a wider range of activities, including food gathering and swimming.</p>	<p>Support</p>	<p>Part 1 Schedule 1</p>	<p>CentrePort generally supports the intent of this objective, and supports the broad requirement to 'maintain or improve' water quality in Te Whanganui-a-Tara coastal management unit.</p>	<p>Retain objective as notified.</p>																																																																																																																																																																																																																																																																																																																																																																																																																																
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	<p>Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives Stormwater discharges to a surface water body or coastal water, or into or onto land in a manner that may enter</p>	<p>Support</p>	<p>Part 1 Schedule 1</p>	<p>CentrePort generally supports the intent of this policy, and supports the broad requirement to 'maintain or improve' water quality for copper and zinc in Te Whanganui-a-Tara coastal management unit.</p>	<p>Retain the policy as notified.</p>																																																																																																																																																																																																																																																																																																																																																																																																																																

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	freshwater or coastal water, are managed so that the baseline water quality state for copper and zinc is maintained, or improved where degraded, including in the relevant part Freshwater Management Unit or coastal water management unit, in order for the coastal water objectives and target attribute states to be met by the timeframes set out in Tables 8.1 and 8.4.			Shipping containers are often made from a steel alloy that contains copper. CentrePort has not specifically monitored for concentrations of copper from the container wharf but will consider this as part of future stormwater upgrades across the port.	
	<p>Policy WH.P12: Managing stormwater from a port or airport</p> <p>The adverse effects, including on aquatic ecosystem health and mahinga kai, contact recreation and Māori customary use, of the discharge of stormwater from a port, or airport, where the discharge will enter water, including via a local authority or state highway stormwater network, shall be avoided or minimised by:</p> <ol style="list-style-type: none"> identifying priorities for improvement, including methods and timeframes for improvement, and having particular regard to protecting sites with identified significant or outstanding values, and implementing good management practice including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and where required to reduce localised adverse effects, or to meet the target attribute states and coastal water objectives, progressively improving discharge quality over time. 	Amend	Part 1 Schedule 1	CentrePort generally supports the intent of this policy and recognises that it is generally aligned with Policy P89 of the operative NRP. CentrePort seeks removal of the word 'avoid' from this policy. It is not realistic to entirely avoid adverse stormwater effects from a large-scale port operation, and the remainder of the policy framework seeks progressive improvement in discharge quality. The use of 'avoid' is also out-of-step with the relevant objectives and rules.	<p>Policy WH.P12: Managing stormwater from a port or airport</p> <p>The adverse effects, including on aquatic ecosystem health and mahinga kai, contact recreation and Māori customary use, of the discharge of stormwater from a port, or airport, where the discharge will enter water, including via a local authority or state highway stormwater network, shall be avoided or minimised by:</p> <ol style="list-style-type: none"> identifying priorities for improvement, including methods and timeframes for improvement, and having particular regard to protecting sites with identified significant or outstanding values, and implementing good management practice including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and where required to reduce localised adverse effects, or to meet the target attribute states and coastal water objectives, progressively improving discharge quality over time.
	<p>Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity</p> <p>The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into a surface water body or coastal water, including through an existing or new local authority stormwater network, that is not a high risk industrial or trade premise or unplanned greenfield development, is a permitted activity, provided the following conditions are met:</p> <p>...</p> <p><i>Note</i></p> <p>Where a property connects to a local authority stormwater network, additional connection requirements and authorisations may be required by the network utility operator.</p> <p>For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to WH.R11. For the creation of new or redevelopment of existing impervious surfaces and associated discharge of stormwater from a port or airport, refer to WH.R8.</p>	Amend	Part 1 Schedule 1	It is unclear how this rule relates to Rule WH.R8, which specifically seeks to manage stormwater discharges from ports. CentrePort seeks clarification regarding how these rules apply. CentrePort has suggested some amendments to the note for Rule WH.R5 (and WH.R7) to clarify that these do not apply to the port. CentrePort welcomes the opportunity to discuss these rules with GWRC prior to hearings.	<p>Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity</p> <p>The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into a surface water body or coastal water, including through an existing or new local authority stormwater network, that is not a high risk industrial or trade premise or unplanned greenfield development, is a permitted activity, provided the following conditions are met:</p> <p>...</p> <p><i>Note</i></p> <p>Where a property connects to a local authority stormwater network, additional connection requirements and authorisations may be required by the network utility operator.</p> <p>For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to WH.R11. For the creation of new or redevelopment of existing impervious surfaces and associated discharge of stormwater from a port or airport, refer to WH.R8.</p>

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	<p>Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas – controlled activity</p> <p>The use of land for the creation of new and/or redevelopment of impervious surfaces of an existing urbanised property and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not a high risk industrial or trade premise, is a controlled activity, provided the following conditions are met:</p> <p>...</p> <p><i>Note</i></p> <p>For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises, refer to Rule WH.R11. For the creation of new or redevelopment of existing impervious surfaces and associated discharge of stormwater, refer to Rule WH.R8.</p>	Amend	Part 1 Schedule 1	<p>It is unclear how this rule relates to Rule WH.R8, which specifically seeks to manage stormwater discharges from ports. CentrePort seeks clarification regarding how these rules apply.</p> <p>CentrePort has suggested some amendments to the note for Rule WH.R7 (and WH.R5) to clarify that these do not apply to the port.</p> <p>CentrePort welcomes the opportunity to discuss these rules with GWRC prior to hearings.</p>	<p>Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas – controlled activity</p> <p>The use of land for the creation of new and/or redevelopment of impervious surfaces of an existing urbanised property and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not a high risk industrial or trade premise, or a port or airport, is a controlled activity, provided the following conditions are met:</p> <p>...</p> <p><i>Note</i></p> <p>For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to Rule WH.R11. For the creation of new or redevelopment of existing impervious surfaces and associated discharge of stormwater from a port or airport, refer to WH.R8.</p>
	<p>Rule WH.R8: Stormwater from a port or airport – restricted discretionary activity</p> <p>The discharge of stormwater from a port or airport into water, or onto or into land where it may enter a surface water body or coastal water, including through a local authority stormwater network, is a restricted discretionary activity where the target attribute state for copper and zinc in Table 8.4 is met for a relevant part Freshwater Management Unit or the coastal water objective for copper and zinc in Table 8.1 is met in the relevant coastal water management unit.</p> <p>Matters for discretion</p> <ol style="list-style-type: none"> 1. The management of the adverse effects of stormwater capture and discharge, including on aquatic ecosystem health and mahinga kai, contact recreation and Māori customary use, and as required by Policy WH.P12 2. The management of effects on sites identified in Schedule A (outstanding water bodies), Schedule B (mana whenua), Schedule C (indigenous biodiversity) 3. Minimisation of the adverse effects of stormwater discharges 4. Provision for hydrological control measures where discharges will enter a surface water body (including via an existing local authority stormwater network), and water sensitive urban design 5. Requirements of any relevant local authority stormwater network discharge consent 	Amend	Part 1 Schedule 1	<p>As stated in previous submission points, it is unclear how Rule WH.R8 relates to Rules WH.R5 and WH.R7. Those rules refer to 'new and redeveloped impervious surfaces', while this rule only relates to the discharge of stormwater.</p> <p>It is unclear whether the 'use of land' aspect of any redevelopment of the port area (and associated discharges) would be considered under Rule WH.R5, R7 or R8. It would likely be most efficient to consider all under a single rule (i.e. Rule WH.R8), so that changes to activities can be reflected via changes to the existing consent, rather than applying both a granted consent and additional plan rules to the same activity (land use and associated discharge of stormwater).</p> <p>CentrePort has suggested changes to other rules to seek clarity in their application but would welcome the opportunity to discuss with GWRC prior to hearings.</p>	<p>Rule WH.R8: Stormwater from a port or airport – restricted discretionary activity</p> <p>The use of land for the creation of new and/or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a port or airport into water, or onto or into land where it may enter a surface water body or coastal water, including through a local authority stormwater network, is a restricted discretionary activity where the target attribute state for copper and zinc in Table 8.4 is met for a relevant part Freshwater Management Unit or the coastal water objective for copper and zinc in Table 8.1 is met in the relevant coastal water management unit.</p> <p>Matters for discretion</p> <ol style="list-style-type: none"> 1. The management of the adverse effects of stormwater capture and discharge, including on aquatic ecosystem health and mahinga kai, contact recreation and Māori customary use, and as required by Policy WH.P12 2. The management of effects on sites identified in Schedule A (outstanding water bodies), Schedule B (mana whenua), Schedule C (indigenous biodiversity) 3. Minimisation of the adverse effects of stormwater discharges 4. Provision for hydrological control measures where discharges will enter a surface water body (including via an existing local authority stormwater network), and water sensitive urban design 5. Requirements of any relevant local authority stormwater network discharge consent <p><i>Note</i></p>

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	<p>Rule WH.R12: All other stormwater discharges – non-complying activity</p> <p>The:</p> <ul style="list-style-type: none"> a) discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule WH.R2, or b) discharge of stormwater into water or onto or into land where it may enter a surface water body or coastal water, that is not permitted by Rule WH.R3, or a restricted discretionary activity under Rules WH.R8 or WH.R9, or c) discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule WH.R4, or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade premise that does not meet the conditions of Rule WH.R11, or d) use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater into water or onto or into land where it may enter water, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or WH.R7, or a discretionary activity under Rule WH.R10 or WH.R11, or a prohibited activity under WH.R13, is a non-complying activity. 	Oppose	Part 1 Schedule 1	<p>Under the operative plan, discharges of stormwater from a port that do not meet the requirements as a restricted discretionary activity, become a discretionary activity. CentrePort seeks that discretionary activity status is retained for activities that cannot meet the requirements of Rule WH.P8.</p> <p>The port is identified as regionally significant infrastructure, and is locationally and operationally constrained; it is inappropriate to apply non-complying activity status to any discharges that do not meet the requirements of Rule WH.P8.</p> <p>Policy WH.P12 generally supports progressive improvement to stormwater management at a port, and this aligns with CentrePort's approach to stormwater management across the port. However CentrePort remains concerned that non-complying activity status will have unintended consequences for any future development at the port.</p>	<p>Rules WH.R5 and WH.R7 do not apply to discharges of stormwater from a port or airport.</p> <p>Retain discretionary activity status for activities that cannot comply with Rule WH.R8.</p>
	<p>Map 79 – Rivers and FMUs</p> 	Amend	Freshwater	<p>Map 79 shows the Wellington urban FMU as applying partially in the coastal marine area, and having overlap with the 'Te Whanganui-a-Tara harbour and estuaries' coastal management unit.</p> <p>The boundaries of the coastal unit adjacent to CentrePort's container wharf do not align with the extent of the coastal marine area, nor with the edge of the commercial port area. It is unclear whether this is deliberate or a mapping error.</p>	<p>Amend the boundary of the Wellington urban FMU to accurately reflect the extent of land at CentrePort's container wharf, and to ensure that there is not overlap with the coastal water management unit.</p> <p>Remove the Wellington urban FMU from wharves and apply the 'Te Whanganui-a-Tara harbour and estuaries' coastal water management unit to these areas.</p> <p>Alternatively, if the mapping extent is not erroneous, provide explanation for the unit boundary and the discrepancy between map layers.</p>

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	<p data-bbox="225 1473 287 2004">Map 82 – Coastal water management units – Te Whanganui-a-Tara</p> 	Amend	Part 1 Schedule 1	<p data-bbox="225 712 510 1218">Map 81 indicates that the boundaries of the 'Te Whanganui-a-Tara harbour and estuaries' coastal water management unit adjacent to CentrePort's container wharf do not align with the extent of the coastal marine area, nor with the edge of the commercial port area. The coastal management unit extends up onto the container wharf area. There is also overlap with the Wellington urban FMU around the container wharf, and the Wellington urban FMU has been applied to the finger wharves (Glasgow, Interisland, Waterloo Wharves). These structures are in the CMA so it is unclear why the coastal management unit has not been applied.</p> <p data-bbox="510 712 670 1218">It is unclear whether this is deliberate or a mapping error, but if CentrePort was to discharge from outfalls along the eastern edge of the container wharf, it appears that these outfalls would not be located in either management unit; conversely, if outfalls were located along the southern end of the container wharf, it appears that two management units would apply.</p> <p data-bbox="670 712 780 1218">CentrePort considers that the Wellington urban FMU should apply to land and the 'Te Whanganui-a-Tara harbour and estuaries' coastal water management unit should apply to the CMA.</p>	<p data-bbox="225 132 335 712">Amend the boundary of the Te Whanganui-a-Tara harbour and estuaries' unit to accurately reflect the extent of coastal marine area adjacent to CentrePort's container wharf, and to ensure that there is not overlap with the Wellington urban FMU.</p> <p data-bbox="335 132 414 712">Remove the Wellington urban FMU from wharves and apply the 'Te Whanganui-a-Tara harbour and estuaries' coastal water management unit to these areas.</p> <p data-bbox="414 132 494 712">Alternatively, if the mapping extent is not erroneous, provide clear and reasoned explanation for the unit boundaries and the discrepancy between map layers.</p>