RMA FORM 5

SUBMISSION ON PUBLICLY NOTIFIED PROPOSED PLAN CHANGE 1 TO THE NATURAL RESOURCES PLAN FOR THE WELLINGTON REGION

CLAUSE 6 OF THE FIRST SCHEDULE, RESOURCE MANAGEMENT ACT 1991

TO: **GREATER WELLINGTON REGIONAL COUNCIL**

1. SUBMITTER DETAILS:

*Submitter Name: Full name, or Name of Organisation / Company	ARAKURA PLAINS DEVELOPMENT LIMITED
Contact person for submission: (If different to above)	C/ Scope Planning Limited Attn: Stephanie Blick
Telephone no: (*Not required*)	021 823 753
*Address for service: (Email, or physical address) Please note, an email address is the preferred method	Stephanie Blick (Scope Planning Limited) stephanie@scopeplanning.co.nz
*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	no
*I could gain an advantage in trade competition through this submission	Yes
Only answer this question if you answered 'yes' to the above question. I am directly affected by an effect of the subject matter of the submission that: A) adversely affects the environment; and B) does not relate to trade competition or the effects of trade competition	A
In providing a submission to Greater Wellington, I agree to having read and understood the terms and procees outlined in this Information Statement	
If providing a submission on behalf of a company / organisation I confirm that I have authority to do so:	[redacted]
Date:	14 December 2023

2. SUBMISSION AND CHANGES SOUGHT

The Submitter **opposes** the following parts of the Proposed PC1:

1. The entirety of PC1; and specifically:
2. Amendments to definitions;
3. Amendments to Chapters 5.2 and 5.3 – Discharges to land and water and Land use rules;
4. New Chapter 8 - Whaitua Te Whanganui-a-Tara
5. New Chapter 9 – Te Awarua-o-Porirua
6. Amendments to schedules
7. Amendments to maps

The Submitter seeks the following amendments to PC1:

1. **Withdrawal** of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks); **OR**
2. Should the relief sought in point 1) not occur, the Submitter seeks the relief set out in Section 3 below; **AND**
3. Any other relief (including consequential relief) to give effect to the decisions sought in Section 3 below.

2.1 REASONS

The reasons for the requested withdrawal of Plan Change 1 are set out below. Should Plan Change 1 not be withdrawn, the reasons for the requested changes to amendments are set out in Section 3.

PLAN CHANGE ERRORS

As revealed in the GWRC Q&A sessions on Plan Change 1, several drafting errors have surfaced, yielding unintended consequences for housing and land development projects, primarily because the provisions took immediate legal effect upon notification. Although the Clause 16 memorandum issued on December 6, 2023, rectified some of these errors, a host of lingering uncertainties persist.

Notably, numerous questions posed during the Q&A sessions were deferred by GWRC Officers to the organisation's legal counsel for responses, which are still pending. Consequently, the application and interpretation of provisions remain in a state of flux, resulting in adverse outcomes for the consenting of housing and land development projects during.

HOUSING AFFORDABILITY

The implications of Plan Change 1 on the affordability of housing and land development in the Wellington Region will be significant and have not been appropriately addressed in the plan change or supporting material. The introduction of a significant financial contribution for new residential units is anticipated to have

cascading effects on housing affordability throughout the region. The new requirements are at odds with Objective 2 and policies relating to housing affordability in the National Policy Statement on Urban Development 2020 (NPS-UD), which seemingly, were not addressed in the Section 32 Report.

Schedule 30 and associated provisions are strongly opposed. Whilst acknowledging the importance of addressing stormwater contaminants, the imposition of a financial contribution is an overly burdensome measure with the potential to impede the urban growth and intensification. This, in turn, could adversely affect housing availability and elevate housing supply costs, thereby exacerbating current challenges associated with housing affordability.

Plan Change 1 and supporting documentation fails to assess the impact on landowners and developers, overlooking the consequential effects on housing supply and affordability. This lack of consideration extends to the potential impacts on the commercial viability of the private sector, which plays a pivotal role in providing new housing supply and construction. The mandatory imposition of a flat fee financial contribution, without nuanced evaluation, risks incentivising the provision of large lots over intensification, undermining, and at odds with Objective 2 and associated policies of National Policy Statement on Urban Development 2020 (NPS-UD), which seemingly, were not addressed in the Section 32 Report.

Moreover, the acknowledgment that stormwater contaminant treatment can only be achieved for a portion of the contaminant load underscores the limitations of the proposed solution. The policy relies heavily on financial contributions, neglecting exploration of alternative solutions and failing to recognise that changes in land use and new developments can lead to improvements in water quality.

While the NPS-UD 2020 prioritizes maintaining or improving freshwater quality, the reliance on financial contributions to offset residual stormwater contaminants is deemed inequitable and inefficient. Anticipating potential water quality deterioration, as outlined in Policy WH.P15 and P.P13, should prompt a more comprehensive exploration of solutions beyond relying solely on financial contributions.

Additionally, Schedule 30 highlights the collection of funds for catchment-scale stormwater treatment systems, but the feasibility, effectiveness, and timing of such systems remain unclear.

Lastly, and probably most concerning is GWRC's follow up answers to the Q&A session that outlines that, even if a development achieves greater than an 85% reduction, the financial contribution would still be mandatory, a stance strongly opposed as lacking proportionality and any effects-based rationale. In essence, the proposed contribution is inconsistent with the purported purpose outlined by the GWRC.

HOUSING DELIVERY

The new non-complying resource consent requirement for winter earthworks is opposed. The Section 32 Evaluation justifies this requirement by citing a heightened risk of sediment discharges during the winter season.

The existing approach to managing winter earthworks should be maintained, wherein a separate approvals process is employed against criteria recently established by GWRC. This method, coupled with oversight by GWRC compliance monitoring officers, has proven effective. Under the current practice, GWRC retains the authority to assess applications for winter works based on their merits, including the project's pre-winter track record. Imposing blanket non-complying activity resource consents for winter works is deemed inappropriate, as it overlooks factors such as the scale, nature, and duration of the works. Nor does it allow evaluation of the management of works already undertaken on the applicable site.

Also, the requirement to stabilize earthworks against erosion and implement sediment controls before shutting down may not be feasible, potentially leading to unintended environmental consequences.

Lastly, the specified shutdown period may not align with the unique conditions of each site. Implementing blanket restrictions is considered an ineffective approach to address the diverse challenges posed by different sites and areas. If an Applicant demonstrates the ability to effectively manage winter works, such instances should be supported to prevent unnecessary delays in housing supply and delivery.

2.2 UNPLANNED DEVELOPMENT

The new provisions relating to unplanned development are opposed.

This is a blunt instrument that denies a consenting pathway for proposals situated in these areas, even if they could yield positive outcomes for the community or freshwater, when compared with the effects of rural activities and land uses.

As the Section 32 Evaluation seemingly suggests that all contaminants can be addressed through a combination of treatment and financial contributions the classification of prohibited activity is therefore deemed inappropriate from an effects management standpoint and lacks justification.

As outlined in the Section 32 Evaluation, it appears that the rationale for the prohibited activity status is to necessitate both a regional and district plan change for greenfield development. This dual requirement poses significant challenges for the private sectors responsiveness to housing needs, making the process both onerous and costly. As a result, this approach could jeopardise the economic viability of development and hinder the supply of affordable housing.

2.3 HYDROLOGICAL CONTROLS

Plan Change 1 does not provide sufficient detail on what types of hydrological controls and water sensitive design are required for various types and scales of development. Further, the conditions outlined in the standards pose significant burdens on property owners and developers, requiring the treatment of all impervious surfaces, while at the same time reducing the need for treatment of all areas through the control of building materials.

Also, that there is a permitted activity rule that applies to impervious surfaces as small as 30m². The creation of these small areas of impervious surfaces should necessitate requirements to seek engineering advice for the design of site-specific controls. In this regard, Plan Change 1 does not adequately evaluating the financial costs on landowners, developers, and district council ratepayers. This includes overlooking the flow-on costs and impacts on the commercial viability of housing supply, housing affordability, and the broader implications of these additional costs on the feasibility of facilitating essential urban growth to accommodate projected population expansion and economic development.

2.4 SUMMARY

Given the errors and current state of flux regarding the application and interpretation of provisions and the significant cost implications of the Plan Change 1 that were not adequately assessed, the Submitter seeks that Plan Change 1 be withdrawn in entirety.

Should Plan Change 1 not be withdrawn, the Submitter seeks the amendments outlined in Section 3 below.

3. AMENDMENTS TO PROVISIONS

Chapter No and Name	Provision No. & Title	Type of Change	Stance	RMA Process	Reason for feedback:	*Decision Sought* *
		Amended *New* *Not applicable to Whaitua* *Not applicable to Te-Awarua-o-Porirua* *N/A*	*Support* *Oppose* *Neutral* *Amend* *Not stated*	*Freshwater* *Part 1 Schedule 1* *Both*	*Please provide a summary of the reasons for your feedback on each provision to help us understand your position.*	*Please describe the actual changes to the provision that you would like to see and, where possible, include your suggested alternative wording.* *NOTE: Any deletions should be identified using ~~strikethrough~~, and insertions should be identified using **bold**.*
Definitions	Hydrological control	New	Amend	Part 1 Schedule 1	This definition will not assist in the interpretation of provisions as it does not outline what these controls actually are. In comparison, the definition of 'stormwater treatment system' which has some examples on what types of systems are included along with specifications in Schedule 28.	Amend definition to outline what hydrological controls are, including examples and a schedule with technical standards.
Definitions	Impervious surfaces	New	Amend	Part 1 Schedule 1	A roof with rainwater collection should be considered not to be an impervious surface where it complies with hydraulic neutrality rules included in recent district plans in these catchments. Implementing grey water reuse would add significantly to development costs, and this is not a requirement of any regulation including Plan Change 1 or the NRP.	**Amend definition as follows and make any other consequential relief necessary to give effect to this submission point:** Surfaces that prevent or significantly impede the infiltration of **stormwater** into soil or the ground, includes: • roofs • paved areas (including sealed/compacted metal) such as roads, driveways, parking areas, sidewalks/foot paths or patios, and excludes: • grassed areas, gardens and other vegetated areas • porous or permeable paving • slatted decks which allow water to drain through to a permeable surface • porous or permeable paving and living roofs

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						• roof areas with rainwater collection ~~and reuse~~ ~~• any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)~~
Definitions	Redevelopment	New	Amend	Part 1 Schedule 1	This definition should exclude extension to existing buildings to allow a baseline for small redevelopment of existing sites as a permitted activity in associated rules.	**Amend definition as follows and make any other consequential relief necessary to give effect to this submission point:** For the purpose of assessment of a proposal involving the **redevelopment** of an existing urbanised property (i.e including brownfield development **upgrades** to existing roads etc.) in relation to **stormwater** effects. this includes the replacement, reconstruction or addition (new) of **impervious surfaces.** Excludes: • minor maintenance or repairs to roads, carparking areas, driveways and paving • installation, maintenance or repair of underground infrastructure or network utilities requiring trenching and resurfacing • activities that only involve the re-roofing of existing buildings • extensions to existing buildings
Definitions	Unplanned greenfield development	New	Oppose	Part 1 Schedule 1	The definition relates to associated prohibited activity rules that are opposed.	**Delete definition:** ~~Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 which also require an underlying zone change (from rural/nonurban/ open space to urban) though a District Plan change to enable the development.~~

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						~~Note: Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023.~~
8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	New	Amend	Part 1 Schedule 1	The unplanned greenfield growth policy and rules are opposed. The prohibited activity status would provide no consenting pathway to consider a proposal located in these areas that may have positive outcomes for the community or even for freshwater, including proposals that provide better outcomes than many intensive rural activities. The Section 32 Evaluation appears to say that all contaminants can be mitigated with a combination of treatment and the use of financial contributions (refer paragraph 64 of Part C). If this statement is accurate, the prohibited activity status is inappropriate in terms of effects management. The prohibited activity status is also inconsistent with the NPS-UD. Policy 8 of the NPS-UD requires that: *Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: a) unanticipated by RMA planning documents; or b) out-of-sequence with planned land release.*	**Amend policy as follows and make any other consequential relief necessary to give effect to this submission point:** Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (a) ~~prohibiting unplanned greenfield development and for other greenfield developments~~ **minimising** ~~the~~ contaminants from greenfield developments ~~and requiring financial contributions as to offset adverse effects from residual stormwater contaminants,~~ and (b) encouraging **redevelopment** activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing **hydrological controls** on urban development and **stormwater** discharges to rivers, and

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					From the Section 32 Evaluation it appears as if the reason for the prohibited activity status is to require both a regional and district plan change to enable a greenfield development. Having to undertake two plan changes would make it very difficult for the market to be responsive to providing housing, it would also be very expensive and would therefore impact the economic viability of development.	(d) requiring a reduction in contaminant loads from urban **wastewater** and **stormwater** networks, and (e) stabilising stream banks by excluding **livestock** from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of **earthworks**, forestry, **cultivation**, and **vegetation clearance** activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with **high erosion risk**, and (h) requiring **farm environment plans** (including Freshwater Farm Plans) to improve **farm** practices that impact on freshwater.
8 Whaitua Te Whanganui-a-Tara	Policy WH.P10: Managing adverse effects of stormwater discharges.	New	Amend	Part 1 Schedule 1	Plan change 1 does not provide sufficient detail on what types of hydrological controls and water sensitive design are required for various types and scales of development. The conditions outlined in sub-sections (a), (b), and (c) (for example, requiring source control) may pose significant burdens on property owners and developers. Additionally, in standard (c), the policy's focus on communal stormwater treatment systems within a catchment or sub-catchment may not be achievable or practical in all scenarios. Considering that there is a permitted activity rule that applies to impervious surfaces as small as 30m², the creation of these small areas of impervious surfaces should not have to seek engineering advice to design site specific controls.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.

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					The Section 32 Evaluation does not adequately assess the costs of the approach proposed by this Plan Change on landowners/developers and the impacts broader urban growth and supply of housing in the region.	
8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development	New	Oppose	Part 1 Schedule 1	The new framework relating to financial contributions as set out in Schedule 30 is opposed. While recognising the importance of addressing the effects associated with stormwater contaminants, the imposition of a financial contribution is an overly burdensome measure that may hinder the growth of greenfield developments, impacting housing availability, placing yet more significant upward pressure on housing supply costs, which has a flow-on effect to housing affordability costs. The Plan Change does not assess the costs on land owners/developers and the flow-on impacts to the supply of housing and housing affordability, and consequential effects on the commercial viability for the private sector to provide for urban growth to accommodate projected population growth and economic development. It is primarily the private sector that provides new housing supply and construction and the mandatory imposition of blanket financial contributions feeds into whether or not the provision of housing supply is commercially viable for the private sector. A mandatory flat fee financial contribution could result in a perverse outcome of incentivising provision of large lots rather than intensification (i.e in order to reduce the amount of financial contribution to be commercially viable). The acknowledgment that stormwater contaminant treatment is only practicable for a portion	Delete policy: ~~Policy WH.P15: Stormwater contaminant offsetting for new greenfield development The adverse effects of residual (post-treatment) **stormwater** contaminants from new greenfield development, roads (not already captured as part of a greenfield development) and state highways where the discharge will enter a **surface water body** or coastal water, including via an existing or new **stormwater network,** are to be offset by way of a financial contribution in accordance with Schedule 30 (financial contribution).~~

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					of the contaminant load further underscores the limitations of the proposed solution. The policy places a heavy reliance on financial contributions without adequately exploring other alternatives and without acknowledging that changes in land use and new developments may result in improvements to water quality. While the NPS-UD 2020 emphasises the need to maintain or improve freshwater quality, the requirement for financial contributions to offset residual stormwater contaminants is not most equitable or efficient approach. Anticipating a potential deterioration in water quality, as outlined in Policy WH.P15 and P.P13, should prompt a more comprehensive exploration of solutions rather than solely relying on financial contributions. The schedule also outlines that collected funds for catchment-scale stormwater treatment systems, but the feasibility, effectiveness and timing of such systems remain unclear. Lastly, GWRC clarification on PC1 outlined that even if a development could achieve greater than 85% reduction, the financial contribution would still be required regardless. This is strongly opposed and not proportionate with the purpose in which GWRC are claiming the contribution is for. In other words, there is no effects-based reason for the charging of the proposed contribution.	
8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	New	Oppose	Part 1 Schedule 1	The avoidance/prohibited approach to greenfield development, is opposed. This activity status would provide no consenting pathway to consider a proposal located in these areas that may have positive outcomes for the community or	Delete policy: ~~Policy WH.P16: Stormwater discharges from new unplanned greenfield development~~ ~~Avoid all new stormwater discharges from unplanned greenfield development where the discharge will enter a surface water body~~

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					even for freshwater, including proposals that provide better outcomes than many intensive rural activities. The use of a prohibited activity status is not consistent with the NPS-UD as outlined above in this submission.	~~or coastal water, including through an existing local authority stormwater network.~~
8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	New	Oppose	Part 1 Schedule 1	The requirement to seek a non-complying resource consent to undertake winter earthworks is opposed. The Section 32 Evaluation states this is because there is higher risk for discharges of sediment over the winter period. However, large rain events cause larger pulses of sediment and these can occur at any time (and these events have become increasingly erratic and occur year round due to climate change). Current practice for the management of winter earthworks should be retained where this is managed through a separate approvals process against GWRC established criteria and with careful management and oversight by GWRC compliance monitoring officers. The current practice works in allowing applications for winter works, and GWRC have the ability under the current practice to grant or decline an application on the merits of the application that includes the track record of the works completed on the project pre-winter. Requiring blanket Non-Complying activity resource consents for winter works is also not appropriate as it doesn't take into account the scale, nature or duration of the works. The requirement to stabilise earthworks against erosion and implement sediment controls prior to shut down may not be feasible in all situations, leading to perverse environmental outcomes.	Delete policy: ~~Policy WH.P31: Winter shut down of earthworks~~ ~~Earthworks over 3,000m2 in area shall:~~ ~~(a) be shut down from 1st June to 30th September each year, and~~ ~~(b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the *Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).*~~

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					Moreover, the prescribed shut down period may not align with the specific site conditions. Blanket restrictions are not the most effective approach to address diverse challenges on different sites and areas. Where an applicant establishes the requirement management of winter works can be achieved, this should be supported to avoid unnecessary delay of housing supply.	
8 Whaitua Te Whanganui-a-Tara	Rule WH.R2: Stormwater to land – permitted activity.	New	Amend	Freshwater	Territorial authorities control new connections to discharge to the network. As written, this rule requires all new connections to the stormwater network to obtain a regional resource consent.	**Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:** Rule WH.R2: Stormwater to land – permitted activity The discharge of **stormwater** onto or into land, including where contaminants may enter groundwater: (a) that is not from a **high risk industrial or trade premise**, or (b) that is not connected to ~~that does not discharge from, or to,~~ a local authority **stormwater network,** is a permitted activity provided the following conditions are met: (…)
8 Whaitua Te Whanganui-a-Tara	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water – permitted activity.	New	Amend	Part 1 Schedule 1	Territorial authorities control new connections to discharge to the network. As written, this rule requires all new connections to the stormwater network to obtain a regional resource consent.	**Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:** Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water – permitted activity The discharge of **stormwater** from an existing individual **property** into water, or onto or into land where it may enter a **surface water body** or coastal water,

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						(a) that is not from a **high risk industrial or trade premise**, or (b) that is not from a port, airport or state highway, or (c) that is not connected to ~~does not discharge from, or to,~~ a local authority **stormwater network,** is a permitted activity, provided the following conditions are met: (…)
8 Whaitua Te Whanganui-a-Tara	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	New	Amend	Part 1 Schedule 1	Plan change 1 does not provide sufficient detail on what types of hydrological controls and water sensitive design are required for various types and scales of development. The conditions outlined in the standards pose significant burdens on property owners and developers, requiring the treatment of all impervious surfaces while at the same time reducing contaminants through building materials. Considering that there is a permitted activity rule that applies to impervious surfaces as small as 30m², the creation of these small areas of impervious surfaces should not have to seek engineering advice to design site specific controls. Plan Change 1 does not assess the financial costs on landowners/developers and district council rate payers, including flow-on costs and impacts on the commercial viability of supply of housing and housing affordability, and the impact these additional costs will have on the viability of providing urban growth necessary to support projected population growth and economic development.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.

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8 Whaitua Te Whanganui-a-Tara	Rule WH.R6: Stormwater from new greenfield impervious surfaces – controlled activity.	New	Amend	Part 1 Schedule 1	Plan Change 1 does not provide sufficient detail on what types of hydrological controls and water sensitive design are required for various types and scales of development. The conditions outlined in the standards pose significant burdens on property owners and developers, requiring the treatment of all impervious surfaces while at the same time reducing contaminants through building materials. Plan Change 1 does not assess the financial costs on landowners/developers and district council rate payers, including flow-on costs and impacts on the commercial viability of supply of housing and housing affordability, and the impact these additional costs will have on the viability of providing urban growth necessary to support projected population growth and economic development.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.
8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas – controlled activity.	New	Amend	Part 1 Schedule 1	Plan Change 1 does not provide sufficient detail on what types of hydrological controls and water sensitive design are required for various types and scales of development. The conditions outlined in the standards pose significant burdens on property owners and developers, requiring the treatment of all impervious surfaces while at the same time reducing contaminants through building materials. Plan Change 1 does not assess the financial costs on landowners/developers and district council rate payers, including flow-on costs and impacts on the commercial viability of supply of housing and housing affordability, and the impact these additional costs will have on the viability of providing urban growth necessary to support	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.

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					projected population growth and economic development.	
8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces – discretionary activity	New	Amend	Part 1 Schedule 1	The introduction of financial contributions in relation to residual (post-treatment) stormwater contaminants is opposed. The framework established for financial contributions fails to acknowledge and recognise that greenfield developments may result in improvements to contaminant discharges. While acknowledging the importance of addressing stormwater contaminants, the imposition of a financial contribution, as outlined in Schedule 30, is opposed. This approach places a disproportionate burden on developers and may hinder housing and urban growth of greenfield developments and which will further exacerbate the commercial viability of affordable housing supply. GWRC should promote responsible development without stifling economic and housing progress.	**Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:** Rule WH.R11: Stormwater from new and redeveloped impervious surfaces – discretionary activity The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of 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 permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or Rule WH.R7, or prohibited under WH.R13 is a discretionary activity provided the following conditions are met: (a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), ~~and~~ ~~(b) if the proposal is for greenfield development a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is~~

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						~~required is set out in Schedule 30 (financial contributions).~~
8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges – non-complying activity.	New	Amend	Part 1 Schedule 1	The avoidance/prohibited approach being taken to greenfield development is opposed. This activity status would provide no consenting pathway to consider a proposal located in these areas that may have positive outcomes for the community or even for freshwater, including proposals that provide better outcomes than many intensive rural activities. The use of a prohibited activity status is not consistent with the NPS-UD as outlined above and cannot be justified.	**Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:** Rule WH.R12: All other stormwater discharges – non-complying activity The: (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

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						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.
8 Whaitua Te Whanganui-a-Tara	Rule WH.R13: Stormwater from new unplanned greenfield development – prohibited activity.	New	Oppose	Part 1 Schedule 1	The avoidance/prohibited approach being taken to greenfield development is opposed. This activity status would provide no consenting pathway to consider a proposal located in these areas that may have positive outcomes for the community or even for freshwater, including proposals that provide better outcomes than many intensive rural activities. The use of a prohibited activity status is not consistent with the NPS-UD as outlined above and cannot be justified.	Delete rule: ~~Rule WH.R13: Stormwater from new unplanned greenfield development – prohibited activity~~ ~~The use of land and the associated discharge of stormwater from impervious surfaces from unplanned greenfield development direct into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or proposed stormwater network, is a prohibited activity.~~
8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	New	Amend	Freshwater	The 'and' after clause b means that any earthworks that are not on a farm now require consent which is unlikely the intent of the rule.	Amend rule: Rule WH.R23: Earthworks – permitted activity **Earthworks** is a permitted activity, provided the following conditions are met: (a) the **earthworks** are to implement an action in the **erosion risk treatment plan** for the **farm**, or (b) the **earthworks** are to implement an action in the **farm environment plan** for the **farm**, ~~and~~ or (c) the area of **earthworks** does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the **earthworks** shall not occur within 5m of a **surface water body** or the coastal marine area, except for **earthworks** undertaken in association with Rules R122,

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						R124, R130, R131, R134, R135, and R137, and (e) soil or debris from **earthworks** is not placed where it can enter a **surface water body** or the coastal marine area, including via a **stormwater network**, and (f) the area of **earthworks** must be **stabilised** within six months after completion of the **earthworks**, and (g) there is no discharge of sediment from **earthworks** and/or flocculant into a **surface water body**, the coastal marine area, or onto land that may enter a **surface water body** or the coastal marine area, including via a **stormwater network**, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a **surface water body** or the coastal marine area, including via a **stormwater network**. *Note* **Earthworks** management guidance is available within the *Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).*
8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	New	Amend	Part 1 Schedule 1	The requirement to seek a non-complying resource consent to undertake winter earthworks is opposed. The Section 32 Evaluation states this is because there is higher risk for discharges of sediment over the winter period. However, large rain events cause larger pulses of sediment and these can occur at any time (and these	**Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:** Rule WH.R24: Earthworks – restricted discretionary activity **Earthworks** and the associated discharge of sediment and/or flocculant into a **surface**

Chapter No and Name	Provision No. & Title	Type of Change	Stance	RMA Process	Reason for feedback:	*Decision Sought* *
					events have become increasingly erratic and occur year round due to climate change). Current practice for the management of winter earthworks should be retained where this is managed through a separate approvals process against GWRC established criteria and with careful management and oversight by GWRC compliance monitoring officers. The current practice works in allowing applications for winter works, and GWRC have the ability under the current practice to grant or decline an application on the merits of the application that includes the track record of the works completed on the project pre-winter. Requiring blanket Non-Complying activity resource consents for winter works is also not appropriate as it doesn't take into account the scale, nature or duration of the works.	**water body** or coastal water, or onto or into land where it may enter a **surface water body** or coastal water, including via a **stormwater network**, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the **earthworks** shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the **zone of reasonable mixing**, decrease the visual clarity in the receiving water by more than: (i) 20% in **River class** 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and ~~(b) earthworks shall not occur between 1st June and 30th September in any year.~~
Chapter 9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	New	Amend	Part 1 Schedule 1	This policy, relating to unplanned greenfield growth, is opposed. This activity status would provide no consenting pathway to consider a proposal located in these areas that may have positive outcomes for the community or even for freshwater, including proposals that provide better outcomes than many intensive rural activities. The Section 32 Evaluation appears to say that all contaminants can be mitigated with a combination of treatment and the use of financial contributions (refer	**Amend policy as follows and make any other consequential relief necessary to give effect to this submission point:** Policy P.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by:

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					paragraph 64 of Part C). The prohibited activity status is inappropriate in terms of effects management and therefore it cannot be justified. The prohibited activity status is also inconsistent with the NPS-UD. Policy 8 of the NPS-UD requires that: *Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: a) unanticipated by RMA planning documents; or b) out-of-sequence with planned land release.* From the Section 32 Evaluation it appears as if the reason for the prohibited activity status is to require both a regional and district plan change to enable a greenfield development. Having to undertake two plan changes would make it very difficult for the market to be responsive to providing housing, it would also be very expensive and would therefore impact the economic viability of development and the supply of affordable housing.	(a) ~~prohibiting unplanned greenfield development and for other greenfield developments~~ **minimising** ~~the~~ contaminants from greenfield developments ~~and requiring financial contributions as to offset adverse effects from residual stormwater contaminants,~~ and (b) encouraging **redevelopment** activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing **hydrological controls** on urban development and **stormwater** discharges to rivers, and (d) requiring a reduction in contaminant loads from urban **wastewater** and **stormwater** networks, and (e) stabilising stream banks by excluding **livestock** from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of **earthworks**, forestry, **cultivation**, and **vegetation clearance** activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with **high erosion risk**, and (h) requiring **farm environment plans** (including Freshwater Farm Plans) to improve **farm** practices that impact on freshwater.
Chapter 9 Te Awarua-o-Porirua Whaitua	Policy P.P10: Managing adverse effects of stormwater discharges.	New	Amend	Part 1 Schedule 1	Plan Change 1 does not provide sufficient detail on what types of hydrological controls and water sensitive design are required for various types and scales of development. The conditions outlined in the standards pose significant burdens on property owners and developers, requiring	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.

Chapter No and Name	Provision No. & Title	Type of Change	Stance	RMA Process	Reason for feedback:	*Decision Sought* *
					the treatment of all impervious surfaces while at the same time reducing contaminants through building materials. Considering that there is a permitted activity rule that applies to impervious surfaces as small as 30m², the creation of these small areas of impervious surfaces should not have to seek engineering advice to design site specific controls.	
Chapter 9 Te Awarua-o-Porirua Whaitua	Policy P.P14: Stormwater contaminant offsetting for new greenfield development	New	Oppose	Part 1 Schedule 1	The introduction of financial contributions in relation to residual (post-treatment) stormwater contaminants is opposed. The policy (and financial contributions framework) fails to acknowledge and recognise that greenfield developments may result in improvements to contaminant discharge. While acknowledging the importance of addressing stormwater contaminants, the imposition of a financial contribution, as outlined in Schedule 30, is opposed. This approach places a disproportionate burden on developers and may hinder housing and urban growth of greenfield developments. GWRC should promote responsible development without stifling economic and housing progress.	Delete policy: ~~The adverse effects of residual (post-treatment) stormwater contaminants from new greenfield development, roads (not already captured as part of a greenfield development) and state highways where the discharge will enter a surface water body or coastal water, including via an existing or new stormwater network, are to be offset by way of a financial contribution in accordance with Schedule 30 (financial contribution).~~
Chapter 9 Te Awarua-o-Porirua Whaitua	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	New	Oppose	Part 1 Schedule 1	The avoidance/prohibited approach to greenfield development is opposed. This activity status would provide no consenting pathway to consider a proposal located in these areas that may have positive outcomes for the community or even for freshwater, including proposals that provide better outcomes than many intensive rural activities. The use of a prohibited activity status is not consistent with the NPS-UD as outlined above in this submission and cannot be justified.	Delete policy: ~~Policy P.P15: Stormwater discharges from new unplanned greenfield development~~ ~~Avoid all new **stormwater** discharges from **unplanned greenfield development** where the discharge will enter a surface water body or coastal water, including through an existing local authority **stormwater network.**~~ ~~*Note*~~

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						~~Any unplanned greenfield development proposals will require a plan change to the regional plan alongside any required plan change to rezone land within the relevant district plan.~~
Chapter 9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	New	Oppose	Part 1 Schedule 1	The requirement to seek a non-complying resource consent to undertake winter earthworks. The Section 32 Evaluation states this is because there is higher risk for discharges of sediment over the winter period. However, large rain events cause larger pulses of sediment and these can occur at any time (and these events have become increasingly erratic and occur year round due to climate change). Current practice for the management of winter earthworks should be retained where this is managed through a separate approvals process against GWRC established criteria and with careful management and oversight by GWRC compliance monitoring officers. The current practice works in allowing applications for winter works, and GWRC have the ability under the current practice to grant or decline an application on the merits of the application that includes the track record of the works completed on the project pre-winter. Requiring blanket Non-Complying activity resource consents for winter works is also not appropriate as it doesn't take into account the scale, nature or duration of the works.	Delete policy: ~~Policy P.P29: Winter shut down of earthworks~~ ~~Earthworks over 3,000m2 in area shall:~~ ~~(a) be shut down from 1st June to 30th September each year, and~~ ~~(b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the *Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).*~~
Chapter 9 Te Awarua-o-Porirua Whaitua	Rule P.R2: Stormwater to land – permitted activity.	New	Amend	Freshwater	Territorial authorities control new connections to discharge to the network. As written, this rule requires all new connections to the stormwater network to obtain a regional resource consent.	**Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:** Rule P.R2: Stormwater to land – permitted activity

Chapter No and Name	Provision No. & Title	Type of Change	Stance	RMA Process	Reason for feedback:	*Decision Sought* *
						The discharge of **stormwater** onto or into land, including where contaminants may enter groundwater (a) that is not from a **high risk industrial or trade premise**, or (b) that is not connected to ~~that does not discharge from, or to~~, a local authority **stormwater network** is a permitted activity provided the following conditions are met: (…)
Chapter 9 Te Awarua-o-Porirua Whaitua	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water – permitted activity.	New	Amend	Part 1 Schedule 1	Territorial authorities control new connections to discharge to the network. As written, this rule requires all new connections to the stormwater network to obtain a regional resource consent.	**Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:** Rule P.R3: Stormwater from an existing individual property to surface water or coastal water – permitted activity The discharge of **stormwater** into water, or onto or into land where it may enter a **surface water body** or coastal water, from an existing individual **property** (a) that is not from a **high risk industrial or trade premise**, or (b) that is not from a state highway, or (c) that is not connected to ~~that does not discharge from, or to~~, a local authority **stormwater network** is a permitted activity provided the following conditions are met: (…)
Chapter 9 Te Awarua-o-Porirua Whaitua	Rule P.R5: Stormwater from new and redeveloped	New	Amend	Part 1 Schedule 1	Plan Change 1 does not provide sufficient detail on what types of hydrological controls and water sensitive design are required for various types and scales of development.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.

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	impervious surfaces – permitted activity.				The conditions outlined in the standards pose significant burdens on property owners and developers, requiring the treatment of all impervious surfaces while at the same time reducing contaminants through building materials. Considering that there is a permitted activity rule that applies to impervious surfaces as small as 30m², the creation of these small areas of impervious surfaces should not have to seek engineering advice to design site specific controls.	
Chapter 9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces – controlled activity.	New	Amend	Part 1 Schedule 1	Plan Change 1 does not provide sufficient detail on what types of hydrological controls and water sensitive design are required for various types and scales of development. The conditions outlined in the standards pose significant burdens on property owners and developers, requiring the treatment of all impervious surfaces while at the same time reducing contaminants through building materials.	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.
Chapter 9 Te Awarua-o-Porirua Whaitua	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas– controlled activity.	New	Amend	Part 1 Schedule 1	Plan Change 1 does not provide sufficient detail on what types of hydrological controls and water sensitive design are required for various types and scales of development. The conditions outlined in the standards pose significant burdens on property owners and developers, requiring the treatment of all impervious surfaces while at the same time reducing contaminants through building materials. Considering that there is a permitted activity rule that applies to impervious surfaces as small as 30m², the	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions. Delete reference to financial contributions.

Chapter No and Name	Provision No. & Title	Type of Change	Stance	RMA Process	Reason for feedback:	*Decision Sought* *
					creation of these small areas of impervious surfaces should not have to seek engineering advice to design site specific controls.	
Chapter 9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious surfaces	New	Amend	Part 1 Schedule 1	The introduction of financial contributions in relation to residual (post-treatment) stormwater contaminants is opposed. The financial contributions framework fails to acknowledge and recognise that greenfield developments may result in improvements to contaminant discharge. While acknowledging the importance of addressing stormwater contaminants, the imposition of a financial contribution, as outlined in Schedule 30, is opposed. This approach places a disproportionate burden on developers and may hinder housing and urban growth of greenfield developments. GWRC should promote responsible development without stifling economic and housing progress. The feasibility, effectiveness and timing of catchment-scale stormwater treatment systems that collected funds will be used for remains unclear.	**Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:** Rule P.R10: Stormwater from new and redeveloped impervious surfaces – discretionary activity The use of land for the creation of new or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of 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 via an existing local authority stormwater network, that is not permitted by Rule P.R5, or a controlled activity under Rule P.R6 or Rule P.R7, or prohibited under P.R12 is a discretionary activity provided the following conditions are met: (a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), and ~~(b) if the proposal is for greenfield development, a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is~~

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						~~required is set out in Schedule 30 (financial contributions).~~
Chapter 9 Te Awarua-o-Porirua Whaitua	Rule P.R11: All other stormwater discharges – non-complying activity.	New	Amend	Part 1 Schedule 1	The avoidance/prohibited approach being taken to greenfield development is opposed. This activity status would provide no consenting pathway to consider a proposal located in these areas that may have positive outcomes for the community or even for freshwater, including proposals that provide better outcomes than many intensive rural activities. The use of a prohibited activity status is not consistent with the NPS-UD as outlined above in this submission.	**Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:** Rule P.R11: All other stormwater discharges – non-complying activity The: (a) discharge of **stormwater** onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule P.R2, or (b) discharge of **stormwater** into water or onto or into land where it may enter water, that is not permitted by Rule P.R3, or a restricted discretionary activity under Rule P.R8, or (c) discharge of **stormwater** from a **high risk industrial or trade premise** that is not permitted by Rule P.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 P.R10, or (d) use of land for the creation of new or **redevelopment** of existing **impervious surfaces** and the associated discharge of **stormwater** water or onto or into land where it may enter water, that is not permitted by Rule P.R5, or a controlled activity under Rules P.R6 or P.R7, or a discretionary

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						activity under Rule P.R9~~, or a prohibited activity under Rule P.R12,~~ is a non-complying activity.
Chapter 9 Te Awarua-o-Porirua Whaitua	Rule P.R12 – Stormwater discharges from new unplanned greenfield development – prohibited activity.	New	Oppose	Part 1 Schedule 1	The avoidance/prohibited approach being taken to greenfield development is opposed. This activity status would provide no consenting pathway to consider a proposal located in these areas that may have positive outcomes for the community or even for freshwater, including proposals that provide better outcomes than many intensive rural activities. The use of a prohibited activity status is not consistent with the NPS-UD as outlined above in this submission and cannot be justified.	Delete rule: ~~Rule P.R12: Stormwater discharges from new unplanned greenfield development – prohibited activity~~ ~~The use of land and the associated discharge of stormwater from impervious surfaces from unplanned greenfield development direct into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or proposed stormwater network, is a prohibited activity.~~
Chapter 9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	New	Amend	Freshwater	The 'and' after clause b means that any earthworks that are not on a farm now require consent which is unlikely the intent of the rule.	**Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:** Rule P.R22: Earthworks – permitted activity **Earthworks** is a permitted activity, provided the following conditions are met: (a) the **earthworks** are to implement an action in the **erosion risk treatment plan** for the **farm**, or (b) the **earthworks** are to implement an action in the **farm environment plan** for the **farm**, ~~and~~ or (c) the area of **earthworks** does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the **earthworks** shall not occur within 5m of a **surface water body** or the coastal marine area, except for **earthworks** undertaken in association with Rules R122,

Chapter No and Name	Provision No. & Title	Type of Change	Stance	RMA Process	Reason for feedback:	*Decision Sought* *
						R124, R130, R131, R134, R135, and R137, and (e) soil or debris from **earthworks** is not placed where it can enter a **surface water body** or the coastal marine area, including via a **stormwater network**, and (f) the area of **earthworks** must be **stabilised** within six months after completion of the **earthworks**, and (g) there is no discharge of sediment from **earthworks** and/or flocculant into a **surface water body**, the coastal marine area, or onto land that may enter a **surface water body** or the coastal marine area, including via a **stormwater network**, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a **surface water body** or the coastal marine area, including via a **stormwater network**. *Note* **Earthworks** management guidance is available within the *Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).*
Chapter 9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	New	Amend	Part 1 Schedule 1	The requirement to seek a non-complying resource consent to undertake winter earthworks is opposed. The Section 32 Evaluation states this is because there is higher risk for discharges of sediment over the winter period. However, large rain events cause larger pulses of sediment and these can occur at any time (and these events have become increasingly erratic and occur year round due to climate change).	**Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:** Rule P.R23: Earthworks – restricted discretionary activity **Earthworks** and the associated discharge of sediment and/or flocculant into a **surface water body** or coastal water, or onto or into

Chapter No and Name	Provision No. & Title	Type of Change	Stance	RMA Process	Reason for feedback:	*Decision Sought* *
					Current practice for the management of winter earthworks should be retained where this is managed through a separate approvals process against GWRC established criteria and with careful management and oversight by GWRC compliance monitoring officers. The current practice works in allowing applications for winter works, and GWRC have the ability under the current practice to grant or decline an application on the merits of the application that includes the track record of the works completed on the project pre-winter. Requiring blanket Non-Complying activity resource consents for winter works is also not appropriate as it doesn't take into account the scale, nature or duration of the works.	land where it may enter a **surface water body** or coastal water, including via a **stormwater network**, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the **earthworks** shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the **zone of reasonable mixing**, decrease the visual clarity in the receiving water by more than: (i) 20% in **River class** 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and ~~(b) **earthworks** shall not occur between 1st June and 30th September in any year.~~
Schedules	Schedule 30: Financial Contributions.	New	Oppose	Part 1 Schedule 1	The new framework relating to financial contributions as set out in Schedule 30 is opposed. While recognising the importance of addressing the effects associated with stormwater contaminants, the imposition of a financial contribution is an overly burdensome measure that may hinder the growth of greenfield developments, impacting housing availability. The acknowledgment that stormwater contaminant treatment is only practicable for a portion of the contaminant load further underscores the limitations of the proposed solution. The policy places a heavy reliance on financial contributions without adequately exploring other alternatives and without acknowledging	Delete Schedule 30.

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					that changes in land use and new developments may result in improvements to water quality. While the NPS-UD 2020 emphasises the need to maintain or improve freshwater quality, the requirement for financial contributions to offset residual stormwater contaminants is not most equitable or efficient approach. Anticipating a potential deterioration in water quality, as outlined in Policy WH.P15 and P.P13, should prompt a more comprehensive exploration of solutions rather than solely relying on financial contributions. The schedule also outlines that collected funds for catchment-scale stormwater treatment systems, but the feasibility, effectiveness and timing of such systems remain unclear. Lastly, GWRC clarification on PC1 outlined that even if a development could achieve greater than 85% reduction, the financial contribution would still be required regardless. This is strongly opposed and not proportionate with the purpose in which GWRC are claiming the contribution is for. In other words, there is no effects-based reason for the charging of the proposed contribution.	
Chapter 13 – Maps	Map 86: Unplanned greenfield areas – Porirua City Council.	New	Oppose	Part 1 Schedule 1	The avoidance/prohibited approach being taken to greenfield development is opposed. This activity status would provide no consenting pathway to consider a proposal located in these areas that may have positive outcomes for the community or even for freshwater, including proposals that provide better outcomes than many intensive rural activities. The use of a prohibited activity status is not consistent with the NPS-UD as outlined above in this submission.	Delete map.

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Chapter 13 – Maps	Map 87: Unplanned greenfield areas – Wellington City Council.	New	Oppose	Part 1 Schedule 1	The avoidance/prohibited approach being taken to greenfield development is opposed. This activity status would provide no consenting pathway to consider a proposal located in these areas that may have positive outcomes for the community or even for freshwater, including proposals that provide better outcomes than many intensive rural activities. The use of a prohibited activity status is not consistent with the NPS-UD as outlined above in this submission.	Delete map.
Chapter 13 – Maps	Map 88: Unplanned greenfield areas – Upper Hutt City Council.	New	Oppose	Part 1 Schedule 1	The avoidance/prohibited approach to greenfield development is opposed. This activity status would provide no consenting pathway to consider a proposal located in these areas that may have positive outcomes for the community or even for freshwater, including proposals that provide better outcomes than many intensive rural activities. The use of a prohibited activity status is not consistent with the NPS-UD as outlined above in this submission and cannot be justified.	Delete map.
Chapter 13 – Maps	Map 89: Unplanned greenfield areas – Hutt City Council.	New	Oppose	Part 1 Schedule 1	The avoidance/prohibited approach to greenfield development is opposed. This activity status would provide no consenting pathway to consider a proposal located in these areas that may have positive outcomes for the community or even for freshwater, including proposals that provide better outcomes than many intensive rural activities. The use of a prohibited activity status is not consistent with the NPS-UD as outlined above in this submission and cannot be justified.	Delete map.

Chapter No and Name	Provision No. & Title	Type of Change	Stance	RMA Process	Reason for feedback:	*Decision Sought* *