

7 March 2023

Greater Wellington Regional Council
Environmental Policy
PO Box 11646
Manners St
WELLINGTON 6142,

Attention: WRC Hearings Advisor
Via email: regionalplan@gw.govt.nz

FURTHER SUBMISSION TO GWRC PLAN CHANGE 1 TO NATURAL RESOURCES PLAN
Form 6, Clause 8 of the First Schedule, RMA

1. DETAILS OF FURTHER SUBMITTER

Name of Submitter: Woodridge Holdings Ltd

Address for service: Simplify Planning Ltd



Attn: Rhys Phillips

Email: rhys@simplifyplanning.co.nz

We wish to be heard in support of my submission at a hearing.

We would consider presenting a joint case at the hearing with others who make a similar submission.

2. CRITERIA APPLICABLE TO FURTHER SUBMITTER:

Woodridge Holding Ltd has an interest in the proposal that is greater than the interest the general public as PC1 directly affects their day to day operations.

3. FURTHER SUBMITTER ACTION

A copy of this submission will be served on the relevant original submitters no later than five working days after this submission to Greater Wellington.

4. DISCLOSURES:

We confirm that we have permission to provide this information on behalf of Woodridge Holdings Ltd.

5. FURTHER SUBMISSION POINTS:

Woodridge Holding Ltd's further submission is provided in the table below.

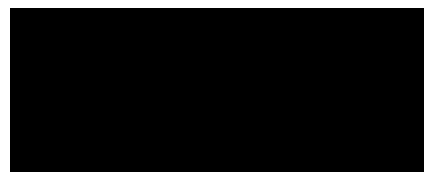
For clarity, Woodridge Holdings Ltd did not have sufficient time to review all 170 submissions and all 941 pages of the summary of submissions in detail. As a result, we focused on the points most relevant to Woodridge Holdings Ltd and the submissions we could support rather than the submissions we oppose.

Our overall view is that there are so many issues with PC1 that the only viable option is to withdraw it and start again using the feedback on PC1 to inform the next draft plan change.

Some of the key issues noted in the further submission below are that:

- Inadequate consultation was undertaken before PC1 was notified and as a result, PC1 is contrary to Subpart 1/Clause 3.2(1) of the NPS-FW.
- The large number of significant issues with PC1 is a clear indication that there was a lack of meaningful consultation (as required by the NPS-FM) and that the preparation of PC1 was rushed.
- There is a disconnect between the outcomes being sought by GW via PC1 and those being sought by TAs giving effect to the NPS-UD. Even though the NPS-FW and the NPS-UD have the same status under the RMA.
 - PC1 conflicts with the intended outcomes of the NPS-UD, being to provide for well-functioning urban environments, including both through infill and greenfield developments.
 - PC1 will have significant consequences for affordability of housing and land development in Wellington Region and is inconsistent with Objective 2 and the associated policies of NPS-UD.
 - The use of the prohibited activity rule for greenfield development is a blunt instrument which conflicts with the NPS-UD and in particular Policy 8.
- The Section 32 report which ignores the housing affordability implications of the proposed changes.
- There is insufficient detail on the types of hydrological controls required for various types and scales of development for a plan change with immediate effect.
- PC1 overlaps with TA responsibilities under the RMA.
 - TAs already collect financial contribution towards stormwater upgrades. GW requiring them is an unnecessary duplication.
 - PC1 Rule WH.R5 would require all brownfield developments to seek consent for stormwater discharges from both District and Regional Councils, which is an unnecessary duplication.
 - TA's are already controlling the use of copper and zinc building materials.
- Shutting down all work during this period would significantly increase the costs and is impractical for large of projects including large infrastructure projects that take years to complete.
- Bring the PC1 rules in with immediate effect will result in the need to redesign numerous pre-committed projects and may impact upon their viability. This was not considered in the s32 analysis.
- Financial contributions are required to offset all residual adverse effects regardless of scale is inconsistent with the RMA which only requires mitigation of residual adverse effects that are more than minor.

Dated at Wellington on 7 March 2024



Signature:

Rhys Philips, Senior Planner

For Simplify Planning Ltd on behalf of the submitted Woodridge Holdings Ltd

General comments

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S219 Cuttriss Consultants Ltd	S219.002 S219.003 S219.004 S247.002 S247.003 S247.004 S219.005 S247.005	General comments - consultation	Allow	Withdraw PC1	<p>Agree that inadequate consultation was undertaken before PC1 was notified. As a result, PC1 is contrary to Subpart 1/Clause 3.2(1) of the NPS-FW which specifies that:</p> <p><i>“Every regional council must engage with communities and tangata whenua to determine how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the region.”</i></p> <p>A draft should have been released for consultation with the community, including the development community. Doing so would limit appeals and ensure a more workable less idealistic document is prepared.</p>
S254 Best Farm Ltd	S254.001 S254.002 S254.003 S254.004	General comments - consultation	Allow	Withdraw PC1	<p>There is a disconnect between the outcomes being sought by TAs giving effect to the NPS-UD and PC1. Even though the NPS-FW and the NPS-UD have the same status under the RMA.</p>
S243 Land Matters Limited	S243.033 S243.034	General comments - consultation	Allow	Withdraw PC1	<p>PC1 conflicts with the intended outcomes of the NPS-UD, being to provide for well-functioning urban environments, including both through infill, and greenfield developments. NPS-UD Policy 6 requires planning decisions that affect urban environments to consider the benefits of urban development and the contributions that development makes to provide or realise development capacity, and this has not been sufficiently considered in PC1 as economic impacts have not been adequately assessed.</p>
S225 Upper Hutt City Council	S225.025	General comments - overall	Allow	Withdraw PC1	<p>The number of significant issues with PC1 is a clear indication that there was a lack of meaningful consultation (as required by the NPS-FM) and that its preparation was rushed.</p> <p>The imposition of new rules with immediate legal effect is inconsistent with subpart 1 of the NPS-FM. As there is still a significant amount of time before the plan change must be notified (31st December 2024) and the new government is proposing changes so it should be withdrawn.</p>
S219 Cuttriss Consultants Ltd	S219.001	General comments - definitions	Allow	Add definition of greenfield development	<p>A definition of 'greenfield development' is required to provide certainty regarding the application of new rules particularly for the application of Rules WH.R6 and P.R6.</p>
S239 Orogen Limited	S239.002	General comments - definitions	Allow	Add definition of 'greenfield development'	<p>The final definition should be prepared in consultation with relevant stakeholders.</p>

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S248 Ara Poutama Aotearoa the Department of Corrections	S248.007	General comments - definitions	Allow	Include definitions for terms including "raingarden" and "bioretention device".	Definitions of "raingarden" and "bioretention device" are required in order to understand PC1.
S177 Transpower New Zealand Limited	S177.022	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Allow		
S59 Upper Hutt Rural Communities - Bob Anker	S59.008	General comments - economic cost/impact	Allow	Withdraw PC1 and Complete a cost- benefit analysis	The section 32 analysis does not adequately quantify the economic, environmental, and cultural costs and benefits of introducing such wide-ranging changes with immediate legal effect, including the cost of projects which are in construction and/or budgeted for this earthworks season but which have no allocated funding for additional consents and/or more restrictive working conditions. PC1 will have significant consequences for affordability of housing and land development in Wellington Region. The significant financial contribution for new residential units will have flow on housing affordability effects in the region and is inconsistent with Objective 2 and associated policies of NPS-UD. This has not been considered in the Section 32 report which ignores the housing affordability implications of the proposed changes.
S275 The New Zealand Transport Agency	S275.001	General comments - overall	Allow	Withdraw PC1 and Complete a cost- benefit analysis	
S161 Gillies Group Management Ltd	S161.006	General comments - stormwater management	Allow	Withdraw PC1	There is insufficient detail on the types of hydrological controls required for various types and scales of development. The standards pose significant burdens on property owners and developers.
S219 Cuttriss Consultants Ltd	S219.002	General comments - overall	Allow	Withdraw PC1	Engineering advice should not be necessary for the creation of small impervious areas. PC1 does not adequately evaluate financial costs on landowners, developers and ratepayers, including flow-on costs on the commercial viability of housing supply and affordability.
S33 Wellington City Council	S33.005	General comments - stormwater management	Allow	Withdraw PC1	The proposed framework for managing the effects of stormwater runoff from development is already or will be regulated through TA's district plans and this would lead to applicants going through two different consenting processes. Stormwater runoff from development should be regulated at the TA level only.

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S247 Carrus Corporation Ltd	S247.008	Unplanned greenfield development	Allow	Withdraw PC1 or remove prohibited activity status for greenfield development.	The use of the prohibited activity rule is a blunt instrument which conflicts with the NPS-UD and in particular Policy 8 and as such could prevent TAs from meeting their ongoing requirements under the NPS-UD.
S211 Hutt City Council	S211.004 S211.005	General comments - urban development	Allow	Withdraw PC1 or remove prohibited activity status for greenfield development.	This provision is likely to lead to unintended consequences. Prohibited activity status will affect the ability of territorial authorities to make strategic decisions on growth and create difficulties with minor changes to urban zoning.
S169 Koru Homes NZ Ltd	S169.050	General comments - unplanned greenfield development	Allow	Withdraw PC1 or remove prohibited activity status for greenfield development.	The prohibited status has not been reasonably justified, and that alternatives that could achieve the strategic intent of the rule without requiring a dual plan change process.
S225 Upper Hutt City Council	S225.014 S225.026	General comments - urban development	Allow	Withdraw PC1 or remove prohibited activity status for greenfield development.	The prohibited status removes a consenting pathway for proposals that may have positive outcomes for the community and for freshwater. The s32 evaluation suggest that contaminants can be addressed through a combination of treatment and financial contributions, therefore prohibited activity status inappropriate.
S265 The Maymorn Collective	S265.002	General comments - unplanned greenfield development	Allow	Withdraw PC1 or remove prohibited activity status for greenfield development.	The requirement for two plan changes to enable greenfield development on the basis that it will create challenges for the private sector's responsiveness to the housing needs, is onerous and costly, and could jeopardise the economic viability of development and supply of affordable housing.
S240 Porirua City Council	S240.004 S240.014	General comments - overall	Allow	Withdraw PC1 or remove prohibited activity status for greenfield development.	The prohibition laden objective and policy framework (both in NRP and RPS) would render future plan change an impossibility due to not implementing the higher order documents, and any section 32 analysis would be at risk of identifying development as being contrary to objectives and policies in these plans.
S33 Wellington City Council	S33.004 S33.018	General comments - unplanned greenfield development	Allow	Withdraw PC1 or remove prohibited activity status for greenfield development.	GWRC should be considering each development individually, based on the merits and the impacts it has on the environment and any mitigation propose.
S161 Gillies Group Management Ltd	S161.005	General comments - unplanned greenfield development	Allow	Withdraw PC1 or remove prohibited activity status for greenfield development.	

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S169 Koru Homes NZ Ltd	S169.005	General comments - unplanned greenfield development	Allow	Withdraw PC1 or remove prohibited activity status for greenfield development.	
S240 Porirua City Council	S240.008	General comments - overall	Allow	Request that Greater Wellington convert both the PC1 and the NRP to an eplan format as soon as practicable to enable plan users to efficiently find information	The PDF format of PC1 and the NRP, with no hyperlinked definitions and with A4 maps in appendices, is out of step with current technology and best practice where plans are presented in digital formats. PC1 and the NRP should be converted to a plan format will improve regulatory compliance and reduce costs through time savings for plan users.
S101 Wellington International Airport Limited	S101.017	Whaitua	Allow	A digital map be should be included which clearly delineates the boundaries of each Whaitua, including both coastal and landward areas.	insert a new planning map which clearly delineates all of the whaitua, including both coastal and landward areas of each one.
S243 Land Matters Limited	S243.036	General comments - urban development	Allow	Remove the new requirements for stormwater management and financial contributions from all new stormwater discharge provisions or amended to provide a more balanced approach to catchment management.	PC1 introduces increased uncertainty and cost to the provision of housing in Wellington region, directly affecting housing affordability. The requirement for financial contributions and risk cost introduced through additional consenting will have flow on effects to the cost of housing in the region and is inconsistent with Objective 2 and associated policies of NPS-UD.
S33 Wellington City Council	S33.003	General comments - water quality	Allow	Remove all requirements in relation to brownfield sites.	WCC is already engaging in multiple statutory and non-statutory processes in processes to achieve water quality improvements. PC1 would require all brownfield development to seek consent for stormwater discharges from both District and Regional Councils, which is an unnecessary duplication.
S225 Upper Hutt City Council	S225.018	General comments - water quality improvements	Allow	Delete all provisions which result in a requirement to seek three waters infrastructure consents from both GW and TA's.	PC1 would require all brownfield development to seek consent for stormwater discharges from both District and Regional Councils, which is an unnecessary duplication. Requiring two consents for the same thing from two different consent authorities is unnecessary and inefficient and will lead to increased costs for all.

Interpretation

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S120 Akatarawa Valley Residents	S120.008	Earthworks	Allow	Provide one definition for earthworks for the region.	The cost and time implications of the "Earthworks" definition do not appear to have been thought through or considered in the s32 analysis.
S239 Orogen Limited	S239.003	Earthworks	Allow	Amend the definition of earthworks to account for the issues raised by the submitters. Including the provision of the previous exceptions, for low-risk and essential activities such as the installation, upgrading and maintenance of services and roads.	
S254 Best Farm Ltd	S254.005	Earthworks	Allow		
S274 Goodman Contractors Limited	S274.001	Earthworks	Allow		
S275 The New Zealand Transport Agency	S275.003	Earthworks	Allow		
S225 Upper Hutt City Council	S225.033	Erosion and sediment management plan	Allow	The "Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region" should be consistently referred to.	Consistent application of a single set of standards is necessary to ensure a consistent approach to this issue.
S33 Wellington City Council	S33.012	mpervious surfaces	Allow	Delete definition or amend to align with TA's following consultation.	Definition is complex and difficult to implement. Impermeable surfaces (permeability) is also a matter of consideration for District Plans as set out in 80E of the RMA and 3.5(4) of the NPS-FM. Roofs and other surfaces which discharge via a hydraulic neutrality device in accordance with the relevant TA rules should be excluded from the definition.
S161 Gillies Group Management Ltd	S161.008	mpervious surfaces	Allow		
S240 Porirua City Council	S240.011	mpervious surfaces	Allow		
S33 Wellington City Council	S33.013	Redevelopment	Allow	Amend the definition taking into account for the issues raised by the submitters.	The proposed definition is unreasonable. It does not take into consideration the need to intensify development in urban areas and overlaps with the functions of territorial authorities and the consideration for stormwater management as set out in 80E of the RMA and 3.5(4) of the NPS-FM. The definition does not work in the context of the NPS-UD and conflicts with the Policies of PC1. For example Policy WH.P2 seeks to "encourage"
S38 Summerset Group Holdings Limited	S38.003	Redevelopment	Allow	Delete all associated rules requiring additional consents from GW for consent for development.	

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S151 Wellington Water Ltd	S151.024	Redevelopment	Allow	If the above is not done provided exemptions for maintenance, extensions and alterations. Make it clear that these rules do not apply when the redeveloped of site does not increase the permitted hard surfacing on the site ie: the current hard surfacing + and allowance provide for under the definition and/or rules.	<p>redevelopment, but associated provisions, including this definition do not permit the associated increases in impervious surfaces that would be expected with the use of this term in a policy.</p> <p>WH.R4 refers to "redevelopment of existing impervious surfaces" which implies that the definition of redevelopment is inclusive of maintenance of existing impervious surfaces.</p> <p>The definition should exclude minor alterations and additions to existing buildings to provide for the small redevelopment of existing sites as a permitted activity in associated rules.</p> <p>Except where required in relation to heritage buildings, zinc or copper roofs should be excluded from the final exception clause.</p> <p>Concerned about implications definition may have on business-as-usual activities undertaken by territorial authorities and infrastructure providers.</p> <p>What does "minor maintenance or repairs to roads, carparking areas, driveways and paving" mean?</p> <p>It is egregious to require 'like for like' replacements and renewals. Redevelopment of a site should be permitted provide the overall impervious surface area is not increased.</p>
S161 Gillies Group Management Ltd	S161.009	Redevelopment	Allow		
S219 Cuttriss Consultants Ltd	S219.007	Redevelopment	Allow		
S225 Upper Hutt City Council	S225.041	Redevelopment	Allow		
S240 Porirua City Council	S240.013	Redevelopment	Allow		
S247 Carrus Corporation Ltd	S247.007	Redevelopment	Allow		
S257 Kāinga Ora	S257.006	Redevelopment	Allow		

Beds of lakes and rivers

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S225 Upper Hutt City Council	S225.050	Beds of lakes and rivers general conditions.	Allow	Retain as operative, do not amend as proposed.	The amendment to point (n) implies that works could not be undertaken if identified birds are in the area for any purpose. As some birds may nest year round this clause may prevent the maintenance or construction of significant infrastructure even outside the critical period.

Other Methods

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S240 Porirua City Council	S240.016	Method M36: Freshwater Action Plan programme.	Allow	Amend so that FAP's cannot be developed or amended without formal engagement of the relevant stakeholders, including relevant landowners, catchment communities and TAs.	<p>Amend for consistency with NPS-FM.</p> <p>Amend this and all policies so that FAPs cannot be developed or amended without formal engagement of the relevant stakeholders, catchment communities and TAs. noting that Subpart 1/Clause 3.2(1) of the NPS-FW which specifies that:</p> <p><i>“Every regional council must engage with communities and tangata whenua to determine how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the region.”</i></p>
S193 Wairarapa Federated Farmers	S193.050	Method M37: Freshwater Action Plan for the Parangarahu Lakes.	Allow		
S240 Porirua City Council	S240.017	Method M38: Freshwater Action Plan for the Rangituhi catchment.	Allow		
S193 Wairarapa Federated Farmers	S193.053	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Allow	Amend this and all other methods so that FPAP's cannot be developed or amended without formal engagement of the relevant stakeholders, including relevant landowners, catchment communities and TAs.	

Whaitua Te Whanganui-a-Tara

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S38 Summerset Group Holdings Limited	S38.005	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Allow	Amend policy so that greenfield developments are not prohibited.	<p><i>The use of a prohibited activity rule is a blunt instrument which conflicts with the NPS-UD and in particular Policy 8 and as such could prevent territorial authorities from meeting its ongoing requirements under the NPS-UD.</i></p> <p><i>This provision is likely to lead to unintended consequences.</i></p> <p><i>Prohibited activity status will affect the ability of territorial authorities to make strategic decisions on growth and create difficulties with minor changes to urban zoning.</i></p>
S161 Gillies Group Management Ltd	S161.011	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Allow		<p><i>The prohibited status has not been reasonably justified, and that alternatives that could achieve the strategic intent of the rule without requiring a dual plan change process.</i></p> <p><i>The prohibited status removes a consenting pathway for proposals that may have positive outcomes for the community and for freshwater.</i></p> <p><i>As the s32 evaluation suggest that contaminants can be addressed through a combination of treatment and financial contributions, prohibited activity status inappropriate.</i></p>
S169 Koru Homes NZ Ltd	S169.006	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Allow		<p><i>The requirement for two plan changes to enable greenfield development will create challenges for the private sector's responsiveness to the housing needs, is onerous and costly, and could jeopardise the economic viability of development and supply of affordable housing.</i></p> <p><i>The prohibition laden objective and policy framework (both in NRP and RPS) would render future plan changes an impossibility as they would likely be identified as being contrary to objectives and policies of the higher order planning framework set up by GW via PC1.</i></p>
S211 Hutt City Council	S211.010	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Allow		<p><i>GWRC should be considering each development individually, based on the merits and the impacts it has on the environment and any mitigation propose.</i></p>
S219 Cuttriss Consultant s Ltd	S219.009	Policy WH.P2 Management of activities to	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
		achieve target attribute states and coastal water objectives.			
S225 Upper Hutt City Council	S225.067	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Allow		
S247 Carrus Corporation Ltd	S247.009	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Allow		
S33 Wellington City Council	S33.036	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Allow	Amend so that FAP's cannot be developed or amended without formal engagement of the relevant stakeholders, including relevant andowners, catchment communities and TAs.	Amend for consistency with NPS-FM noting that Subpart 1/Clause 3.2(1) of the NPS-FW which specifies that: <i>"Every regional council must engage with communities and tangata whenua to determine how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the region."</i>
S33 Wellington City Council	S33.042	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Allow	Amend policy to clarify GWRC role is managing copper and zinc contamination.	Management of copper and zinc contamination is currently managed by District Plans. As a result, there is no need for PC1 to contains rules regarding this issue. All that is required is appropriate objectives and policies which the TA can implement via the rules in the District Plans.

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S38 Summerset Group Holdings Limited	S38.006	Policy WH.P10: Managing adverse effects of stormwater discharges.	Allow	Review policy and rule framework for the treatment of stormwater and provide technical standards for acceptable solutions.	PC1 lacks sufficient detail on the types of hydrological controls and water sensitive designs required for various types and scales of development. Compliance with this policy will be difficult and will require expensive bespoke solutions as there are no technical guidelines/compliant solutions incorporated into the plan change. For example, the creation of small areas of impervious surfaces should not require engineering advice to design site specific controls.
S161 Gillies Group Management Ltd	S161.012	Policy WH.P10: Managing adverse effects of stormwater discharges.	Allow		The cost of this approach on landowners/developers and the impacts on housing supply in the region has not been sufficiently assessed in the Section 32 Evaluation.
S211 Hutt City Council	S211.013	Policy WH.P10: Managing adverse effects of stormwater discharges.	Allow		
S33 Wellington City Council	S33.046	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Allow	Delete policy as notified, or significantly modify to address the concerns raised in these submissions, including removing the words "from new greenfield developments" and lowering all treatment targets.	The proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes. Stormwater discharges are already managed via global stormwater discharge consents, and TAs manage land use and therefore stormwater discharges via the land use consent process.
S243 Land Matters Limited	S243.005	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Allow		The proposed regional plan rule framework duplicates consenting requirements. GWRC should focus on higher-level management of discharge consents. Review 85% treatment requirement based on complete economic analysis including impacts on housing and business land supply throughout the region. The practicalities of complying with this policy needed to be thoroughly assessed before PC1 was released, including via consultation with affected parties. There will be instances where it is not practicable to achieve hydrological controls due to topographical, geotechnical, and other constraints. Ready made 'acceptable solutions' should have been developed and included in PC1.

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S33 Wellington City Council	S33.047	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Allow	Delete policy as notified, or significantly modify to address the concerns raised in these submissions, including removing the words "from new greenfield developments" and lowering all treatment targets.	<p>The proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes.</p> <p>Financial contributions to offset all residual adverse effects regardless of scale is inconsistent with the RMA and NPS-FM, which only requires mitigation of residual adverse effects that are more than minor.</p>
S38 Summerset Group Holdings Limited	S38.008	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Allow		<p>TAs already collect financial contribution towards stormwater upgrades. GW requiring them is an unnecessary duplication.</p> <p>The proposed financial contribution will decrease housing affordability.</p> <p>A mandatory flat fee financial contribution may incentivise large lots over intensification.</p>
S161 Gillies Group Management Ltd	S161.013	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Allow		
S33 Wellington City Council	S33.048	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Allow	Delete policy.	<p>No greenfield development is every 'unplanned' as they must go through a TA plan change and/or resource consent process. As a result, this terminology is misleading.</p> <p>As there is no way to entirely "avoid" all new stormwater discharges this policy could never be complied with. In effect a prohibition of greenfield development. Such an approach is not necessary to achieve the objectives and policies of the NPS-FM 2020 and is contrary to the NPS-UD.</p>

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S38 Summerset Group Holdings Limited	S38.009	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Allow		This policy conflicts with the intended outcomes of the NPS-UD to provide for well-functioning urban environments, including both through infill, and greenfield developments. Policy 6 requires planning decisions that affect urban environments to consider the benefits of urban development and the contributions that development makes to provide or realise development capacity, and this has not been sufficiently considered in PC1 as economic impacts have not been assessed.
S219 Cuttriss Consultants Ltd	S219.011	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Allow		This provision is likely to lead to unintended consequences. The policy will negatively affect the ability of territorial authorities to make strategic decisions on growth and create difficulties with minor changes to urban zoning. The prohibition laden objective and policy framework (both in NRP and RPS) would render future plan changes an impossibility as they would likely be identified as being contrary to objectives and policies of the higher order planning framework set up by GW via PC1.
S225 Upper Hutt City Council	S225.079	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Allow		GWRC should be considering each development individually, based on the merits and the impacts it has on the environment and any mitigation propose.
S243 Land Matters Limited	S243.007	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Allow		
S247 Carrus Corporation Ltd	S247.011	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Allow		
S257 Kāinga Ora	S257.021	Policy WH.P16: Stormwater	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
		discharges from new unplanned greenfield development.			
S225 Upper Hutt City Council	S225.092	Policy WH.P30: Discharge standard for earthworks.	Allow	Delete policy or amend to be a policy rather than a rule or standard	This policy is written in the form of a rule or standard rather than outlining how an objective will be implemented.
S161 Gillies Group Management Ltd	S161.015	Policy WH.P31: Winter shut down of earthworks.	Allow	Delete policy and make earthworks great than 3,000m ² between 1 June and 30 September a Discretionary Activity.	This policy is written in the form of a rule or standard rather than outlining how an objective will be implemented. The current method of site-specific assessments during winter works is achieving the objectives of the NPS-FW.
S211 Hutt City Council	S211.017	Policy WH.P31: Winter shut down of earthworks.	Allow		Shutting down all work during this period would significantly increase the costs and is impractical for large of projects including large infrastructure projects that take years to complete.
S219 Cuttriss Consultants Ltd	S219.012	Policy WH.P31: Winter shut down of earthworks.	Allow		
S225 Upper Hutt City Council	S225.093	Policy WH.P31: Winter shut down of earthworks.	Allow		
S239 Orogen Limited	S239.004	Policy WH.P31: Winter shut down of earthworks.	Allow		
S243 Land Matters Limited	S243.019	Policy WH.P31: Winter shut down of earthworks.	Allow		
S247 Carrus Corporation Ltd	S247.012	Policy WH.P31: Winter shut	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
		down of earthworks.			
S248 Ara Poutama Aotearoa the Department of Corrections	S248.028	Policy WH.P31: Winter shut down of earthworks.	Allow		
S286 Taranaki Whānui	S286.062	Policy WH.P31: Winter shut down of earthworks.	Allow		
S33 Wellington City Council	S33.060	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	Allow	Delete	The proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes. PC1 Rule WH.R5 would require all brownfield developments to seek consent for stormwater discharges from both District and Regional Councils, which is an unnecessary duplication. Requiring two consents for the same thing from two different consent authorities is unnecessary and inefficient and will lead to increased costs for all.
S151 Wellington Water Ltd	S151.093	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow	f not deleted significantly amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.	Stormwater discharges are already managed via a global stormwater discharge consent, and TAs manage land use and therefore stormwater discharges via the land use consent process. (a) Should be deleted as it discourages development of large brownfield sites. This is something which should be encouraged. Especially as GW is effectively preventing any future greenfield development.
S161 Gillies Group Management Ltd	S161.018	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		(b) Should be deleted as the materials used are controlled by TAs. A policy in the NRP would be sufficient as TAs will have to incorporate appropriate rules into their District Plans to meet that policy. (c) Territorial authorities are responsible for the discharged from their networks. A policy in the NRP would be sufficient as TAs will have to incorporate appropriate rules into their District Plans to meet that policy.

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S209 Enviro NZ Services Ltd (Enviro NZ)	S209.020	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		<p>(c)(i) Is somewhat ironic. Why is it necessary to implement hydrological controls for greenfield development. when PC1 effectively bans them.</p> <p>(c)(ii) applies equally to existing and new impervious surfaces >30m². So, in effect any redevelopment (eg relaying a section of a drive) or new work (installing a carpad) >30m² would require a GW consent.</p>
S219 Cuttriss Consultant s Ltd	S219.015	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		<p>Clause (c) is too vague as it does not specify what the hydrological controls have to achieve and there is insufficient detail on the types of hydrological controls required for various types and scales of development. Engineering advice should not be necessary for the creation of mpervious areas of 31m².</p> <p>The new requirements are inconsistent with provisions relating to housing affordability in the NPS-UD, and their costs are not addressed in the s32 report. These changes are likely to add considerably to the cost of developing and as a result will add to housing prices.</p>
S225 Upper Hutt City Council	S225.098	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		<p>Bring the PC1 rules in with immediate effect will result in the need to redesign numerous pre-committed projects, and may impact upon their viability. This was not considered in the s32 analysis.</p>
S238 Greater Wellington Regional Council	S238.011	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S239 Orogen Limited	S239.005	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		
S243 Land Matters Limited	S243.020	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		
S247 Carrus Corporation Ltd	S247.015	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		
257 Kāinga Ora	S257.028	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S33 Wellington City Council	S33.061	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow	Delete	<p>WH.R6 is somewhat ironic. Why is it necessarily have a controlled rule for new greenfield impervious surfaces when PC1 effectively bans them?</p> <p>The proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes.</p> <p>Stormwater discharges are already managed via a global stormwater discharge consent, and TAs manage land use and therefore stormwater discharges via the land use consent process.</p>
S38 Summerset Group Holdings Limited	S38.014	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow		<p>Requiring two consents for the same thing from two different consent authorities is unnecessary and inefficient and will lead to increased costs for all.</p> <p>(a) Should be deleted as it discourages development of large brownfield sites. This is something which should be encouraged. Especially as GW is effectively preventing any future greenfield development.</p>
S169 Koru Homes NZ Ltd	S169.014	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow		<p>(b) Any new or replaced hard surface area >30m² is unable to comply with WH.R5.(c)(ii). As a result WH.R6(b) requires a controlled activity consent for all new or replacement impervious surfaces between 30m² and 1,000m².</p> <p>(c) Requiring Financial contributions to offset all residual adverse effects regardless of scale is inconsistent with the RMA and NPS-FM, which only require mitigation where residual adverse effects that are more than minor.</p>
S243 Land Matters Limited	S243.021	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow		<p>(d) Territorial authorities are responsible for the discharged from their networks. A policy in the NRP would be sufficient as TAs will have to incorporate appropriate rules into their District Plans to meet that policy.</p> <p>(e) Review 85% treatment requirement based on complete economic analysis including impacts on housing and business land supply throughout the region.</p> <p>The practicalities of complying with this Policy needed to be thoroughly assessed before PC1 was releases, including via consultation with affected parties. There will be instances where it is not practicable to achieve hydrological controls due to</p>

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S247 Carrus Corporation Ltd	S247.016	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow		<p>topographical, geotechnical and other constraints.</p> <p>Ready made 'acceptable solutions' should have been developed and included in PC1.</p> <p>s too vague as it does not specify what the hydrological controls have to achieve and there is insufficient detail on the types of hydrological controls required for various types and scales of development. Engineering advice should not be necessary for the creation of impervious areas of 31m².</p>
S247 Carrus Corporation Ltd	S247.017	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow		<p>The new requirements are inconsistent with provisions relating to housing affordability in the NPS-UD, and their costs are not addressed in the s32 report. These changes are likely to add considerably to the cost of developing and as a result will add to housing prices.</p> <p>Bring the PC1 rules in with immediate effect will result in the need to redesign numerous pre-committed projects, and may impact upon their viability. This was not considered in the s32 analysis.</p>
S33 Wellington City Council	S33.062	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Allow		<p>Hydrological controls should not be required if there is no overall increase in impervious surfaces as part of a development, regardless of the area.</p>
S225 Upper Hutt City Council	S225.100	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S33 Wellington City Council	S33.065	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Allow	Delete	As for Rule WH.R5 and WHR6 above f not deleted significantly amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.
S161 Gillies Group Management Ltd	S161.021	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Allow		
S169 Koru Homes NZ Ltd	S169.016	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Allow		
S173 Arakura Plains Development Limited	S173.021	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Allow		
S225 Upper Hutt City Council	S225.102	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces -	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S226 Higgins Contractors Limited	S226.015	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Allow		
S38 Summerset Group Holdings Limited	S38.016	Rule WH.R12: All other stormwater discharges - non-complying activity.	Allow	Delete f not deleted significantly amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.	As for Rule WH.R5, WH.R6 WH.R11 above. Discretionary activity status is more appropriate than non-complying activity status
S169 Koru Homes NZ Ltd	S169.017	Rule WH.R12: All other stormwater discharges - non-complying activity.	Allow		
S217 R P Mansell; A J Mansell, & M R Mansell	S217.010	Rule WH.R12: All other stormwater discharges - non-complying activity.	Allow		
S243 Land Matters Limited	S243.023	Rule WH.R12: All other stormwater discharges - non-complying activity.	Allow		
S33 Wellington City Council	S33.067	Rule WH.R13: Stormwater from new unplanned greenfield development -	Allow	Delete and amend so that Stormwater from new unplanned greenfield development is a Discretionary Activity status is more appropriate.	The use of the prohibited activity rule is a blunt instrument which conflicts with the NPS-UD and n particular Policy 8 and as such could prevent territorial authorities from meeting its ongoing requirements under the NPS-UD. This provision is likely to lead to unintended consequences.

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
		prohibited activity.			Prohibited activity status will affect the ability of territorial authorities to make strategic decisions on growth and create difficulties with minor changes to urban zoning.
S38 Summerset Group Holdings Limited	S38.017	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Allow		<p>The prohibited status has not been reasonably justified, and that alternatives that could achieve the strategic intent of the rule without requiring a dual plan change process.</p> <p>The prohibited status removes a consenting pathway for proposals that may have positive outcomes for the community and for freshwater.</p> <p>The s32 evaluation suggest that contaminants can be addressed through a combination of treatment and financial contributions, therefore the prohibited activity status inappropriate.</p>
S219 Cuttriss Consultants Ltd	S219.019	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Allow		<p>The requirement for two plan changes to enable greenfield development on the basis that it will create challenges for the private sector's responsiveness to the housing needs, is onerous and costly, and could jeopardise the economic viability of development and supply of affordable housing.</p> <p>The prohibition laden objective and policy framework (both in NRP and RPS) would render future plan change an impossibility due to not implementing the higher order documents, and any section 32 analysis would be at risk of identifying development as being contrary to objectives and policies in these plans.</p>
S220 Rosco Ice Cream Ltd	S220.016	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Allow		<p>GWRC should be considering each development individually, based on the merits and the impacts it has on the environment and any mitigation propose.</p>
S225 Upper Hutt City Council	S225.104	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S236 Parkvale Road Limited	S236.010	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Allow		
S239 Orogen Limited	S239.008	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Allow		
S241 Pukerua Property Group Ltd	S241.019	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Allow		
S243 Land Matters Limited	S243.030	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S247 Carrus Corporation Ltd	S247.019	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Allow		
S256 Waste Management NZ Limited	S256.012	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Allow		
S257 Kāinga Ora	S257.033	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Allow		
S33 Wellington City Council	S33.071	Rule WH.R23: Earthworks - permitted activity.	Allow	Amend to take into consideration these submissions including removal of the (iv) and the requirements that there no "no discharge of sediment from earthworks."	Subclause (g) cannot be meet as you cannot guarantee that no sediment will leave the site or enter a waterbody, and that sediment is already managed by subcaluse (h).
S38 Summerset Group Holdings Limited Trading Limited	S38.018	Rule WH.R23: Earthworks - permitted activity.	Allow	Amend Items (c)(1v) and (c)(v) so that they allow an appropriate level of SS ion any stormwater discharge.	As Orogen Notes, the technical reports for PC1, reference studies specifying that the sediment removal of all devices are less than 100% and sediment discharges continue to occur, albeit at ower rates, even when the earthworks area is stabilised.
S239 Orogen Limited	S239.009	Rule WH.R23: Earthworks - permitted	Allow	50g/m3 to Schedule A sites	AS currently written no earthworks will meet the permitted activity criteria, regardless of size and treatment.

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
		activity.		and 100g/m ³ to any other water body are noted in WH.R3 (notes these levels may need to be amended following submission by experts in this field).	
S161 G Gillies Group Management Ltd	S161.025	Rule WH.R24: Earthworks - restricted discretionary activity.	Allow	Remove (b) from WH.R24 and delete WH.R25 so that earthworks are not a non-complying activity.	<p>Whilst there is greater potential for earthworks to have negative adverse effects during the winter period between 1 June and 30 September it does not automatically follow that all earthworks underway during this period will have negative effects.</p> <p>Each job should be treated on its merits and conditioned accordingly, and one of the matters for discretion is the "timing of the works".</p> <p>The matter for discretion, "The proportion of unestablished land in the catchment.", is vague and gives an applicant no idea what % of disturbance is likely to be acceptable per catchment and makes the applicant reliant upon the actions of others.</p> <p>If the % limit for a catchment is exceeded because there are multiple developments in the area, how does Council decide who goes first? This could cause a trade competition issue.</p> <p>The current method of site-specific assessments during winter works in achieving the objectives of the NPS-FW. A blanket non-complying activity status does not take into account the scale, nature or duration of works.</p> <p>Shutting down all work during this period would significantly increase the costs and is impractical for large projects including large infrastructure projects that take years to complete.</p>
S211 Hutt City Council	S211.024	Rule WH.R24: Earthworks - restricted discretionary activity.	Allow		
S219 Cuttriss Consultants Ltd	S219.020	Rule WH.R24: Earthworks - restricted discretionary activity.	Allow		
S239 Orogen Limited	S239.011	Rule WH.R24: Earthworks - restricted discretionary activity.	Allow		
S247 Carrus Corporation Ltd	S247.020	Rule WH.R24: Earthworks - restricted discretionary activity.	Allow		

Te Awarua-o-Porirua

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S247 Carrus Corporation Ltd	S247.021	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Allow	Amend policy so that greenfield developments are not prohibited.	<p>The use of the prohibited activity rule is a blunt instrument which conflicts with the NPS-UD and in particular Policy 8 and as such could prevent territorial authorities from meeting its ongoing requirements under the NPS-UD.</p> <p>This provision is likely to lead to unintended consequences.</p> <p>Prohibited activity status will affect the ability of territorial authorities to make strategic decisions on growth and create difficulties with minor changes to urban zoning.</p> <p>The prohibited status has not been reasonably justified, and that alternatives that could achieve the strategic intent of the rule without requiring a dual plan change process.</p> <p>The prohibited status removes a consenting pathway for proposals that may have positive outcomes for the community and for freshwater.</p> <p>The s32 evaluation suggest that contaminants can be addressed through a combination of treatment and financial contributions, therefore the prohibited activity status inappropriate.</p> <p>The requirement for two plan changes to enable greenfield development on the basis that it will create challenges for the private sector's responsiveness to the housing needs, is onerous and costly, and could jeopardise the economic viability of development and supply of affordable housing.</p> <p>The prohibition laden objective and policy framework (both in NRP and RPS) would render future plan change an impossibility as they are likely to be found to be on conflict with the higher order documents.</p> <p>GWRC should be considering each development individually, based on the merits and the impacts it has on the environment and any mitigation propose.</p>
S38 Summerset Group Holdings Limited	S38.022	Policy P.P13: Stormwater discharges from new and redeveloped	Allow	Delete policy as notified, or significantly modify to address the concerns raised in these submissions, including removing the words	<p>The proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes.</p> <p>Stormwater discharges are already managed via a global stormwater discharge consent, and TAs manage land use and therefore stormwater discharges via the land use consent process.</p>

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
		impervious surfaces.		"from new greenfield developments" and lowering all treatment targets.	The proposed regional plan rule framework duplicates consenting requirements. GWRC should focus on higher-level management of discharge consents.
S151 Wellington Water Ltd	S151.117	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Allow		Review 85% treatment requirement based on complete economic analysis including impacts on housing and business land supply throughout the region.
S240 Porirua City Council	S240.044	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Allow		The practicalities of complying with this Policy needed to be thoroughly assessed before PC1 was released, including via consultation with affected parties. There will be instances where it is not practicable to achieve hydrological controls due to topographical, geotechnical and other constraints. Ready made 'acceptable solutions' should have been developed and included in PC1.
S33 Wellington City Council	S33.097	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Allow	Delete policy as notified, or significantly modify to address the concerns raised in these submissions, including removing the words "from new greenfield developments" and lowering all treatment targets.	The proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes. Financial contributions to offset all residual adverse effects regardless of scale is inconsistent with the RMA and NPS-FM, which only requires mitigation of residual adverse effects that are more than minor.
S38 Summerset Group Holdings Limited	S38.023	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Allow		TAs already collect financial contribution towards stormwater upgrades. GW requiring them is an unnecessary duplication. The proposed financial contribution will decrease housing affordability.
S161 Gillies Group Management Ltd	S161.028	Policy P.P14: Stormwater contaminant offsetting for new greenfield development	Allow		A mandatory flat fee financial contribution may incentivise large lots over intensification.

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S165 Pukerua Holdings Ltd	S165.028	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Allow		
S169 Koru Homes NZ Ltd	S169.023	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Allow		
S173 Arakura Plains Development Limited	S173.028	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Allow		
S243 Land Matters Limited	S243.017	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Allow		
S254 Best Farm Ltd	S254.008	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Allow		
S33 Wellington City Council	S33.098	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Allow	Delete policy.	<p>No greenfield development is every 'unplanned' as they have to go through a TA plan change and/or resource consent process. As a result, this terminology is inappropriate.</p> <p>As there is no way to entirely "avoid" all new stormwater discharges this policy could never be complied with. In effect a prohibition of greenfield development. Such an approach is not necessary to achieve the objectives and policies of the NPS-FM 2020 and is contrary to the NPS-UD.</p>

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S38 Summerset Group Holdings Limited	S38.024	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Allow		This policy conflicts with the intended outcomes of the NPS-UD to provide for well-functioning urban environments, including both through infill, and greenfield developments. Policy 6 requires planning decisions that affect urban environments to consider the benefits of urban development and the contributions that development makes to provide or realise development capacity, and this has not been sufficiently considered in PC1 as economic impacts have not been assessed.
S169 Koru Homes NZ Ltd	S169.024	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Allow		This provision is likely to lead to unintended consequences. The policy will negatively affect the ability of territorial authorities to make strategic decisions on growth and create difficulties with minor changes to urban zoning. The prohibition laden objective and policy framework (both in NRP and RPS) would render future plan change an impossibility due to not implementing the higher order documents, and any section 32 analysis would be at risk of identifying development as being contrary to objectives and policies in these plans.
S173 Arakura Plains Development Ltd	S173.029	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Allow		GWRC should be considering each development individually, based on the merits and the impacts it has on the environment and any mitigation propose.
S240 Porirua City Council	S240.046	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Allow		
S243 Land Matters Limited	S243.018	Policy P.P15: Stormwater discharges from new unplanned greenfield development	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S251 Peka Peka Farm Limited	S251.012	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Allow		
S254 Best Farm Ltd	S254.009	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Allow		
S38 Summerset Group Holdings Limited	S38.025	Policy P.P29: Winter shut down of earthworks.	Allow	Delete policy and make earthworks greater than 3,000m ² between 1 June and 30 September a Discretionary Activity.	This policy is written in the form of a or standard rather than outlining how an objective will be implemented. The current method of site- specific assessments during winter works in achieving the objectives of the NPS-FW.
S169 Koru Homes NZ Ltd	S169.025	Policy P.P29: Winter shut down of earthworks.	Allow		Shutting down all work during this period would significantly increase the costs and is impractical for large of projects including large infrastructure projects that take years to complete.
S173 Arakura Plains Development Ltd	S173.030	Policy P.P29: Winter shut down of earthworks.	Allow		
S177 Transpower New Zealand Limited	S177.053	Policy P.P29: Winter shut down of earthworks.	Allow		
S206 Winstone Aggregates	S206.076	Policy P.P29: Winter shut down of earthworks.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S217 R P Mansell; A J Mansell, & M R Mansell	S217.023	Policy P.P29: Winter shut down of earthworks.	Allow		
S219 Cuttriss Consultants Ltd	S219.025	Policy P.P29: Winter shut down of earthworks.	Allow		
S254 Best Farm Ltd	S254.011	Policy P.P29: Winter shut down of earthworks.	Allow		
S257 Kāinga Ora	S257.054	Policy P.P29: Winter shut down of earthworks.	Allow		
S274 Goodman Contractors Limited	S274.003	Policy P.P29: Winter shut down of earthworks.	Allow		
S275 The New Zealand Transport Agency	S275.035	Policy P.P29: Winter shut down of earthworks.	Allow		
S275 The New Zealand Transport Agency	S275.036	Policy P.P29: Winter shut down of earthworks.	Allow		
S275 The New Zealand Transport Agency	S275.040	Policy P.P29: Winter shut down of earthworks.	Allow		
S285 Civil Contractors New Zealand	S285.031	Policy P.P29: Winter shut down of earthworks.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S33 Wellington City Council	S33.110	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow	Delete If not deleted significantly amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.	PC1 Rule P.R5 would require all brownfield developments to seek consent for stormwater discharges from both District and Regional Councils, which is an unnecessary duplication. The proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes. Stormwater discharges are already managed via a global stormwater discharge consent, and TAs manage land use and therefore stormwater discharges via the land use consent process.
S38 Summerset Group Holdings Limited	S38.028	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		Requiring two consents for the same thing from two different consent authorities is unnecessary and inefficient and will lead to increased costs for all. (a) Should be deleted as it discourages development of large brownfield sites. This is something which should be encouraged. Especially as GW is effectively preventing any future greenfield development. (b) Should be deleted as the material used are controlled by TAs. A policy in the NRP would be sufficient as TAs will have to incorporate appropriate rules into their District Plans to meet that policy. (c) Territorial authorities are responsible for the discharged from their networks. A policy in the NRP would be sufficient as TAs will have to incorporate appropriate rules into their District Plans to meet that policy.
S151 Wellington Water Ltd	S151.125	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		(c)(i) Is somewhat ironic. Why is it necessary to implement hydrological controls for greenfield development. when PC1 effectively bans them. (c)(ii) applies equally to existing and new impervious surfaces >30m ² . So, in effect any redevelopment (eg relaying a section of a drive) or new work 9insalling a carpad) >30m ² would require a GW consent. Clause (c) is too vague as it does not specify what the hydrological controls have to achieve
S161 Gillies Group Management Ltd	S161.033	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S169 Koru Homes NZ Ltd	S169.028	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		and there is insufficient detail on the types of hydrological controls required for various types and scales of development. Engineering advice should not be necessary for the creation of impervious areas of 31m ² . The new requirements are inconsistent with provisions relating to housing affordability in the NPS-UD, and their costs are not addressed in the s32 report. These changes are likely to add considerably to the cost of developing and as a result will add to housing prices.
S173 Arakura Plains Development Ltd	S173.033	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		Bring the PC1 rules in with immediate effect will result in the need to redesign numerous pre-committed projects, and may impact upon their viability. This was not considered in the s32 analysis.
S209 Enviro NZ Services Ltd (Enviro NZ)	S209.047	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		
S219 Cuttriss Consultants Ltd	S219.028	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S247 Carrus Corporation Ltd	S247.028	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		
S254 Best Farm Ltd	S254.012	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		
S257 Kāinga Ora	S257.056	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		
S33 Wellington City Council	S33.111	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow	Delete If not deleted significantly amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.	P.R6 is somewhat ironic. Why is it necessarily have a controlled rule for new greenfield impervious surfaces when PC1 effectively bans them? The proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes. Stormwater discharges are already managed via a global stormwater discharge consent, and TAs manage land use and therefore stormwater discharges via the land use consent process.
S38 Summerset Group Holdings Limited	S38.029	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled	Allow		Requiring two consents for the same thing from two different consent authorities is unnecessary and inefficient and will lead to increased costs for all. (a) Should be deleted as it discourages development of large brownfield sites. This is

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
		activity.			something which should be encouraged. Especially as GW is effectively preventing any future greenfield development.
S161 Gillies Group Management Ltd	S161.034	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow		(b) Any new or replaced hard surface area >30m ² is unable to comply with P.R5.(c)(ii). As a result P.R6(b) requires a controlled activity consent for all new or replacement impervious surfaces between 30m ² and 1,000m ² .
S165 Pukerua Holdings Ltd	S165.034	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow		(c) Requiring Financial contributions to offset all residual adverse effects regardless of scale is inconsistent with the RMA and NPS-FM, which only require mitigation where residual adverse effects that are more than minor.
S169 Koru Homes NZ Ltd	S169.029	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow		(d) Territorial authorities are responsible for the discharged from their networks. A policy in the NRP would be sufficient as TAs will have to incorporate appropriate rules into their District Plans to meet that policy.
S173 Arakura Plains Development Ltd	S173.034	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow		(e) Review 85% treatment requirement based on complete economic analysis including impacts on housing and business land supply throughout the region. The practicalities of complying with this Policy needed to be thoroughly assessed before PC1 was releases, including via consultation with affected parties. There will be instances where it is not practicable to achieve hydrological controls due to topographical, geotechnical and other constraints. Ready made 'acceptable solutions' should have been developed and included in PC1.
S243 Land Matters Limited	S243.025	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow		s too vague as it does not specify what the hydrological controls have to achieve and there is insufficient detail on the types of hydrological controls required for various types and scales of development. Engineering advice should not be necessary for the creation of impervious areas of 31m ² . The new requirements are inconsistent with provisions relating to housing affordability in the NPS-UD, and their costs are not addressed in the s32 report. These changes are likely to add considerably to the cost of developing and as a result will add to housing prices. Bring the PC1 rules in with immediate effect will result in the need to redesign numerous pre-committed projects, and may impact upon their viability. This was not considered in the s32 analysis. Hydrological controls should not be required if there is no overall increase in impervious surfaces as part of a development, regardless of the area.

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S254 Best Farm Ltd	S254.013	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow		
S33 Wellington City Council	S33.112	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas- controlled activity.	Allow		
S38 Summerset Group Holdings Limited	S38.030	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas- controlled activity.	Allow		
S161 Gillies Group Management Ltd	S161.035	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas- controlled activity.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S243 Land Matters Limited	S243.026	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas-controlled activity.	Allow		
S247 Carrus Corporation Ltd	S247.030	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas-controlled activity.	Allow		
S254 Best Farm Ltd	S254.014	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas-controlled activity.	Allow		
S33 Wellington City Council	S33.115	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary	Allow	Delete If not deleted significantly amend to limit the applicability of the rule to development that is not connected to local authority	As for Rule P.R5 – PR7 above

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
		activity.		stormwater networks.	
S161 Gillies Group Management Ltd	S161.036	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Allow		
S169 K Koru Homes NZ Ltd	S169.031	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Allow		
S243 Land Matters Limited	S243.027	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Allow		
S254 Best Farm Ltd	S254.015	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Allow		
S38 Summerset Group Holdings Limited	S38.031	Rule P.R11: All other stormwater discharges - non-complying activity.	Allow	Delete If not deleted significantly amend to limit the applicability of the rule to	As for Rules P.R5 – PR10 above. Discretionary activity status is more appropriate than non-complying activity status

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S161 Gillies Group Management Ltd	S161.037	Rule P.R11: All other stormwater discharges - non-complying activity.	Allow	development that is not connected to local authority stormwater networks.	
S165 Pukerua Holdings Ltd	S165.037	Rule P.R11: All other stormwater discharges - non-complying activity.	Allow		
S169 Koru Homes NZ Ltd	S169.032	Rule P.R11: All other stormwater discharges - non-complying activity.	Allow		
S173 Arakura Plains Development Ltd	S173.037	Rule P.R11: All other stormwater discharges - non-complying activity.	Allow		
S243 Land Matters Limited	S243.028	Rule P.R11: All other stormwater discharges - non-complying activity.	Allow		
S257 Kāinga Ora	S257.060	Rule P.R11: All other stormwater discharges - non-complying activity.	Allow		
S33 Wellington City Council	S33.117	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Allow	Delete rules and make discharges from greenfield developments a Discretionary Activity	<p>The use of the prohibited activity rule is a blunt instrument which conflicts with the NPS-UD and in particular Policy 8 and as such could prevent territorial authorities from meeting its ongoing requirements under the NPS-UD.</p> <p>This provision is likely to lead to unintended consequences.</p> <p>Prohibited activity status will affect the ability of territorial authorities to make strategic decisions on growth and create difficulties with minor changes to urban zoning.</p>

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S38 Somerset Group Holdings Limited	S38.032	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Allow		<p>The prohibited status has not been reasonably justified, and that alternatives that could achieve the strategic intent of the rule without requiring a dual plan change process.</p> <p>The prohibited status removes a consenting pathway for proposals that may have positive outcomes for the community and for freshwater.</p> <p>The s32 evaluation suggest that contaminants can be addressed through a combination of treatment and financial contributions, therefore the prohibited activity status inappropriate.</p>
S161 Gillies Group Management Ltd	S161.038	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Allow		<p>The requirement for two plan changes to enable greenfield development on the basis that it will create challenges for the private sector's responsiveness to the housing needs, is onerous and costly, and could jeopardise the economic viability of development and supply of affordable housing.</p> <p>The prohibition laden objective and policy framework (both in NRP and RPS) would render future plan changes an impossibility as they are likely to be found to be contrary to objectives and policies in these plans.</p>
S239 Orogen Limited	S239.016	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Allow		<p>GWRC should be considering each development individually, based on the merits and the impacts it has on the environment and any mitigation propose.</p>
S240 Porirua City Council	S240.070	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S243 Land Matters Limited	S243.029	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Allow		
S161 Gillies Group Management Ltd	S161.039	Rule P.R22: Earthworks - permitted activity.	Allow	Amend to take into consideration these submissions including removal of the (iv) and the requirements that there no	Subclause (g) cannot be meet as you cannot guarantee that no sediment will leave the site or enter a waterbody, and that sediment is already managed by subcaluse (h). As Orogen Notes, the technical reports for PC1, reference studies specifying that the sediment removal of all devices are less than 100% and sediment discharges continue to occur, albeit at ower rates, even when the earthworks area is stabilised.
S254 Best Farm Ltd	S254.019	Rule P.R22: Earthworks - permitted activity.	Allow	“no discharge of sediment from earthworks.”	No earthworks will meet the permitted activity criteria, regardless of size and treatment.
S257 Kāinga Ora	S257.064	Rule P.R22: Earthworks - permitted activity.	Allow	Amend Items (c)(1v) and (c)(v) so that they allow an appropriate level of SS in any stormwater discharge	
S38 Summerset Group Holdings Limited	S38.034	Rule P.R23: Earthworks - restricted discretionary activity.	Allow	Remove (b) from P.R23 and delete WH.R24 so that earthworks are a Discretionary Activity.	Whilst there is greater potential for earthworks to have negative adverse effects during the winter period between 1 June and 30 September it does not automatically follow that all earthworks underway during this period will have negative effects. Each job should be treated on its merits and conditioned accordingly, and one of the matters for discretion is the "timing of the works".
S161 Gillies Group Management Ltd	S161.040	Rule P.R23: Earthworks - restricted discretionary activity.	Allow		The matter for discretion, "The proportion of unestablished land in the catchment.", is vague and gives an applicant no idea what % of disturbance is likely to be acceptable per catchment and makes the applicant reliant upon the actions of others.
S219 Cuttriss Consultants Ltd	S219.031	Rule P.R23: Earthworks - restricted discretionary activity.	Allow		f the % limit for a catchment is exceeded because there are multiple developments in the area, how does Council decide who goes first? This could cause a trade competition issue. The current method of site- specific assessments during winter works in achieving the

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S239 Orogen Limited	S239.017	Rule P.R23: Earthworks - restricted discretionary activity.	Allow		objectives of the NPS-FW. A blanket non-complying activity status does not consider the scale, nature or duration of works. Shutting down all work during this period would significantly increase the costs and is impractical for large of projects including large infrastructure projects that take years to complete.
S254 Best Farm Ltd	S254.020	Rule P.R23: Earthworks - restricted discretionary activity.	Allow		

Schedules

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S33 Wellington City Council	S33.138	Schedule 30: Financial Contributions	Allow	Delete Schedule 30.	For the reasons given under other parts of submission, there should not be financial contributions on stormwater discharges. Including: TAs already collect financial contribution towards stormwater upgrades. GW requiring them is an unnecessary duplication.
S165 PUKERUA HOLDINGS LIMITED	S165.041	Schedule 30: Financial Contributions.	Allow		PC1 will have significant consequences for affordability of housing and land development in Wellington Region. The significant financial contribution for new residential units will have flow on housing affordability effects in the region and is inconsistent with Objective 2 and associated policies of NPS-UD. This has not been considered in the Section 32 report which ignores the housing affordability implications of the proposed changes.
S169 Koru Homes NZ Ltd	S169.036	Schedule 30: Financial Contributions.	Allow		A mandatory flat fee financial contribution may incentivise large lots over intensification.
S173 Arakura Plains Development Ltd	S173.041	Schedule 30: Financial Contributions.	Allow		The requirement for financial contributions and risk cost introduced through additional consenting will have flow on effects to the cost of housing in the region and is inconsistent with Objective 2 and associated policies of NPS-UD.
S220 Rosco Ice Cream Ltd	S220.019	Schedule 30: Financial Contributions.	Allow		
S236 Parkvale Road Limited	S236.011	Schedule 30: Financial Contributions.	Allow		Financial contributions to offset all residual adverse effects regardless of scale is inconsistent with the RMA and NPS-FM, which only requires mitigation of residual adverse effects that are more than minor.

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S241 Pukerua Property Group Ltd	S241.038	Schedule 30: Financial Contributions.	Allow		t is not clear what the financial contributions will be used for.
S243 Land Matters Limited	S243.032	Schedule 30: Financial Contributions.	Allow		t unreasonable to collect these contributions tax prior to consent being given effect to. This may make some developments non-viable exacerbating the current housing availability and affordability issues.
S247 Carrus Corporation Ltd	S247.032	Schedule 30: Financial Contributions.	Allow		The schedule also requires the tax be based on the number of EHU's expected to be delivered. This is impossible to predict if the application relates simply to earthworks.
S254 Best Farm Ltd	S254.021	Schedule 30: Financial Contributions.	Allow		Who will be charged with calculating this, what is the dispute resolution process and what happens if any future development delivers less than what was calculated?

Maps

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S38 Summerset Group Holdings Limited	S38.035	Map 86: Unplanned greenfield areas - Porirua City Council.	Allow	Delete maps 86 – 89 and all references to unplanned greenfield areas/development from PC1.	The use of the prohibited activity rule is a blunt instrument which conflicts with the NPS-UD and in particular Policy 8 and as such could prevent territorial authorities from meeting their ongoing requirements under the NPS-UD. This provision is likely to lead to unintended consequences.
S161 Gillies Group Management Ltd	S161.042	Map 86: Unplanned greenfield areas - Porirua City Council.	Allow		Prohibited activity status will affect the ability of territorial authorities to make strategic decisions on growth and create difficulties with minor changes to urban zoning. The prohibited status has not been reasonably justified, and that alternatives that could achieve the strategic intent of the rule without requiring a dual plan change process.
S165 Pukerua Holdings Ltd	S165.042	Map 86: Unplanned greenfield areas - Porirua City Council.	Allow		The prohibited status removes a consenting pathway for proposals that may have positive outcomes for the community and for freshwater.

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S169 Koru Homes NZ Ltd	S169.037	Map 86: Unplanned greenfield areas - Porirua City Council.	Allow		<p>The s32 evaluation suggest that contaminants can be addressed through a combination of treatment and financial contributions. As a result the prohibited activity status inappropriate.</p> <p>The requirement for two plan changes to enable greenfield development will create challenges for the private sector's responsiveness to the housing needs, is onerous and costly, and could eopardise the economic viability of development and supply of affordable housing.</p> <p>The prohibition laden objective and policy framework (both in NRP and RPS) would render future plan change an impossibility as there would be at risk of the proposal being identifying as being contrary to objectives and policies in the higher level planning documents.</p> <p>GWRC should be considering each development individually, based on the merits and the mpacts it has on the environment and any mitigation propose</p>
S173 Arakura Plains Development Ltd	S173.042	Map 86: Unplanned greenfield areas - Porirua City Council.	Allow		
S251 Peka Peka Farm Limited	S251.016	Map 86: Unplanned greenfield areas - Porirua City Council.	Allow		
S257 Kāinga Ora	S257.068	Map 86: Unplanned greenfield areas - Porirua City Council.	Allow		
S38 Summerset Group Holdings Limited	S38.036	Map 87: Unplanned greenfield areas - Wellington City Council.	Allow		
S161 Gillies Group Management Ltd	S161.043	Map 87: Unplanned greenfield areas - Wellington City Council.	Allow		
S165 Pukerua Holdings Ltd	S165.043	Map 87: Unplanned greenfield areas - Wellington City	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
		Council.			
S169 Koru Homes NZ Ltd	S169.038	Map 87: Unplanned greenfield areas - Wellington City Council.	Allow		
S236 Parkvale Road Limited	S236.012	Map 87: Unplanned greenfield areas - Wellington City Council.	Allow		
S38 Summerset Group Holdings Limited	S38.037	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Allow		
S161 Gillies Group Management Ltd	S161.044	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Allow		
S165 Pukerua Holdings Ltd	S165.044	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Allow		
S169 Koru Homes NZ Ltd	S169.039	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S173 Arakura Plains Development Ltd	S173.044	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Allow		
S251 Peka Peka Farm Limited	S251.018	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Allow		
S33 Wellington City Council	S33.151	Map 89: Unplanned greenfield areas - Hutt City Council.	Allow		
S38 Summerset Group Holdings Limited	S38.038	Map 89: Unplanned greenfield areas - Hutt City Council.	Allow		
S161 Gillies Group Management Ltd	S161.045	Map 89: Unplanned greenfield areas - Hutt City Council.	Allow		