


Once you have completed your feedback, please email to [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)

Please enter your details below

<p><b>*Submitter Name:</b> Full name, or Name of Organisation / Company</p>	<p>Summerset Group Holdings Limited</p>
<p><b>Contact person for submission:</b> (If different to above)</p>	<p>c/- Tom Anderson, Incite</p>
<p><b>Telephone no:</b> (Not required)</p>	<p>027 231 0246</p>
<p><b>*Address for service:</b> (Email, or physical address) Please note, an <u>email address</u> is the preferred method</p>	<p>tom@incite.co.nz</p>
<p><b>*I wish to be heard in support of my submission at a hearing</b></p>	<p>Yes</p>
<p><b>*I would consider presenting a joint case at the hearing with others who make a similar submission</b></p>	<p>Yes</p>
<p><b>*I could gain an advantage in trade competition through this submission</b></p>	<p>No</p>
<p>Only answer this question if you answered 'yes' to the above question. <b>I am directly affected by an effect of the subject matter of the submission that:</b> <b>A) adversely affects the environment; and</b> <b>B) does not relate to trade competition or the effects of trade competition</b></p>	<p>N/A</p>
<p style="text-align: center;"><b>In providing a submission to Greater Wellington, I agree to having read and understood the terms and processes outlined in this <b>Information Statement</b></b></p>	
<p>If providing a submission on behalf of a company / organisation <b>I confirm that I have authority to do so:</b></p>	
<p><b>Date:</b></p>	<p>26 January 2026</p>

Please enter your feedback in the next worksheet "**2) Feedback on Provisions**". All of the provisions in the proposed change have been included so please place your comments in the corresponding cells. If you have questions on how to use this submission form please visit our [Submitter User Help Guide](#) or email one of our friendly team at [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)

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 <del>strikethrough</del> , and insertions should be identified using <b>bold</b> .
	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.		Support	Part 1 Schedule 1	<p>The support for this proposed change is made in the context of Summerset’s original submission point on Rule WH.R5 (S38.013) which seeks:</p> <p><i>“Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions.”</i></p> <p>The reason provided in the original submission is:</p> <p><i>“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. There are no technical guidelines incorporated into the plan change that provide solutions that would be deemed to comply with the provisions. As such, compliance with this policy will be difficult and may require expensive bespoke solutions to be created on a case-by-case basis. Considering that there is a permitted activity rule that applies to impervious surfaces as small as 30m<sup>2</sup>, the creation of these small areas of impervious surfaces should not have to seek engineering advice to design site specific controls. 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 supply of housing in the region.”</i></p> <p>GWRC acknowledges that there have been such implementation issues as outlined in the Section 32 Evaluation for Variation 1 (refer paragraphs 23 to 28).</p> <p>As such, Summerset supports the proposed delay for WH.R5(c) taking effect until decisions are made on the original submission point.</p>	Retain proposed delay and review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions.
	Rule P.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.		Support	Part 1 Schedule 1	<p>The support for this proposed change is made in the context of Summerset’s original submission point on P.R5 (S38.028) which seeks:</p>	Retain proposed delay and review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions.

				<p><i>“Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions.”</i></p> <p>The reason provided in the original submission is:</p> <p><i>“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. There are no technical guidelines incorporated into the plan change that provide solutions that would be deemed to comply with the provisions. As such, compliance with this policy will be difficult and may require expensive bespoke solutions to be created on a case-by-case basis. Considering that there is a permitted activity rule that applies to impervious surfaces as small as 30m<sup>2</sup>, the creation of these small areas of impervious surfaces should not have to seek engineering advice to design site specific controls. 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 supply of housing in the region.”</i></p> <p>GWRC acknowledges that there have been such implementation issues as outlined in the Section 32 Evaluation for Variation 1 (refer paragraphs 23 to 28).</p> <p>As such, Somerset supports the proposed delay for P.R5(c) taking effect until decisions are made on the original submission point.</p>	
	Schedule 30: Financial Contributions		Part 1 Schedule 1	<p>The support for this proposed change is made in the context of Somerset’s original submission point on policies WH.P15 (S38.008) and P.P14 (S38.023) which seek deletion of these policies which require stormwater contaminant offsetting for new greenfield development.</p> <p>The reason provided in the original submission for deletion of these policies is:</p> <p><i>“The Section 32 Evaluation does not adequately assess the costs of the approach proposed by this policy on landowners/developers, and the impacts on broader supply of housing in the region. It is therefore inconsistent with the NPS-UD including Policy 8.</i></p>	Retain proposed delay for financial contribution payment and delete policies WH.P15 and P.R14.

				<p><i>Further, it is unclear how this policy interacts with the prohibited activity approach for unplanned greenfield development.”</i></p> <p>GWRC acknowledges that there have been such implementation issues as outlined in the Section 32 Evaluation for Variation 1 (refer paragraphs 25 to 28).</p> <p>As such, Somerset supports the proposed delay for financial contributions being paid until decisions are made on the original submission points.</p>	
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