

**Appendix 5: Table of recommendations on submissions**

For text in the ‘Decision requested’ column that shows additions and deletions in colour, please see the original submission on the PC1 website: <https://www.gw.govt.nz/your-region/plans-policies-and-bylaws/updating-our-regional-policy-statement-and-natural-resources-plan/natural-resources-plan-2023-changes/consultationssubmitters/>

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S101.006	Wellington International Airport Limited (S101)			General comments	General comments - earthworks	Oppose		Considers regular maintenance and repair of the roads, runways, taxiways and aprons at the Airport to ensure their safety and functionality is maintained should be excluded from the proposed new earthworks provisions. Considers that in the absence of this change, the submitter will be subject to an inefficient and unnecessary consenting burden for activities that form part of its ongoing operational requirements. Opposes the winter shutdown provisions as it fails to provide a consenting pathway for large scale infrastructure projects that often span months to years in duration and will add significant cost and time to infrastructure projects undertaken by WIAL and likely other infrastructure providers, and will constrain infrastructure providers ability to meet the ongoing needs of the community. Considers the approach fails to recognise that some earthworks activities must avoid certain breeding, spawning or nesting periods if significant indigenous fauna are located on site.	Not stated		Reject
	Wellington International Airport Limited	FS23.1259	Forest & Bird	General comments	General comments - earthworks		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought except for where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S101.012	Wellington International Airport Limited (S101)			2 Interpretation	Earthworks	Oppose		In order to facilitate the ongoing and timely maintenance and repair of WIAL assets, considers that the existing earthworks exclusion for activities relating to the repair or maintenance of existing roads and tracks, airfield runways, taxiways and parking aprons for aircraft should be included in the proposed new earthworks definition. Considers without the exclusion the submitter will be subject to an inefficient and unnecessary consenting burden for activities that form part of its ongoing operational requirements. Notes that WIAL actively manages all earthworks undertaken at the airport due to the potentially significant effects that poorly managed earthworks can have on aircraft operations and safety.	Retain the operative definition of earthworks insofar as it relates to the Airport or exclude the repair or maintenance of existing roads and tracks, airfield runways, taxiways and parking aprons for aircraft at the Airport from the earthworks definition for Whaitua Te Whanganui-a-Tara.		Reject
	Wellington International Airport Limited	FS23.1265	Forest & Bird	2 Interpretation	Earthworks		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought except for where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S101.036	Wellington International Airport Limited (S101)			5.2 and 5.3 Discharges to land and water and land use rules	Rule R101: Earthworks – permitted activity.	Amend		Should the relief sought by the submitter with respect to Chapter 8 of the NRP not be accepted, the submitter opposes the proposed exclusion of these provisions as they relate to Whaitua Te Whanganui-a-Tara.	Retain application of these provisions to Whaitua Te Whanganui-a-Tara (by removing the symbol).		Reject
	Wellington International Airport Limited	FS23.1289	Forest & Bird	5.2 and 5.3 Discharges to land and water and	Rule R101: Earthworks – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent	Disallow	Oppose the whole of the submission and all relief sought except for where points are	Accept

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				land use rules				with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).		consistent with Forest & Bird's submission points and specific relief.	
	Wellington International Airport Limited	FS47.143	Meridian Energy Limited	5.2 and 5.3 Discharges to land and water and land use rules	Rule R101: Earthworks – permitted activity.		Support	Meridian opposes aspects of the Whaitua-specific rules for stormwater management and, if Meridian's submission points are accepted, agrees Rule R101 should be retained (in preference) as relevant for all Whaitua;	Allow	Allow S101.036 and retain Rule R101 for all Whaitua.	Reject
S101.053	Wellington International Airport Limited (S101)			8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Not Stated		Considers "Rural land use" and "earthworks" are distinctly different activities. Notes that if the provisions within this section are intended to only apply to earthworks associated with rural land use activities, consideration should be given to separating these provisions out into different sections of the NRP.	Not stated		Reject
	Wellington International Airport Limited	FS23.1306	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought except for where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S101.054	Wellington International Airport Limited (S101)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Oppose		Considers it is impractical to expect sediment discharges to be entirely retained on site given the nature and location of works on the WIAL site (ie. at the coastal interface).	Amend the policy to make it clear that it applies only to Rural land use in line with this section of the proposed RPS. Or establish a standalone policy (and rule) that provides for earthworks associated with the Airport or alternatively, regionally significant infrastructure more broadly. Or delete and revert to Operative NRP.		Reject
	Wellington International Airport Limited	FS23.1307	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought except for where points are consistent with Forest & Bird's submission points and specific relief.	Accept
	Wellington International Airport Limited	FS33.012	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Support	It is unclear whether Policy WH.P29 is intended to apply just to Rural land use, in line with the heading in this section of the Plan Change, or to all earthworks. Any policy applying to earthworks in an urban setting should focus on managing the adverse effects, rather than risk of sediment discharges from earthworks.	Allow	Allow submission and make the changes sought.	Reject
S101.055	Wellington International Airport Limited (S101)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose		Opposes the policy as it does not provide a consenting pathway for large scale infrastructure projects that can span months to years in duration. Considers prohibiting earthworks for a four month period will add significant cost and time to infrastructure projects undertaken by WIAL and likely other infrastructure providers and fails to recognise that some earthworks activities have to avoid certain breeding, spawning or nesting periods if significant indigenous fauna are located on site. Considers that when such constraints are combined with the policy directive to avoid the period 1 June to 30 September, implementation of projects may become unworkable.	Establish a standalone policy (and rule) that provides for earthworks associated with the Airport or regionally significant infrastructure more broadly. Or delete and revert to Operative NRP.		Accept in part
	Wellington International Airport Limited	FS23.1308	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought except for where points are consistent with Forest	Reject

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										& Bird's submission points and specific relief.	
	Wellington International Airport Limited	FS47.178	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support in part	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow in part	Allow S101.055 in part by deleting Policy WH.P31, or by amending the policy to exclude earthworks for the purpose of regionally significant infrastructure.	Accept
S101.067	Wellington International Airport Limited (S101)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Oppose		Notes the rule may inadvertently be breached where an activity is not related to farming. Notes subparagraphs (d) and (e) appear to be addressing the same issue and could be combined. For the reasons set out with respect to Policy WH.P29 in the submission, submitter is concerned with the proposed drafting of subparagraph (g) and considers that it is impractical to require all discharges to be entirely retained on site.	Amend the rule as follow: Earthworks is a permitted activity, provided the following conditions are met: (a) where the earthworks are related to farming they to implement an action in the erosion risk treatment plan for the farm, or (b) where the earthworks are related to farming they to implement an action in the farm environment plan for the farm, or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and		Accept
	Wellington International Airport Limited	FS23.1320	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought except for where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Wellington International Airport Limited	FS47.254	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Meridian considers clause (g) is impractical, unachievable and unreasonable;	Allow	Allow S101.067.	Accept
S101.068	Wellington International Airport Limited (S101)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Oppose		Considers it is not clear how (a) relates to coastal water when the visual clarity indicators only relate to freshwater bodies. For the reasons set out with respect to Policy WH.P31 in the submission, the submitter opposes subparagraph (b) and matter of discretion 8 and considers they should both be deleted in their entirety. Considers s separate restricted discretionary earthworks rule should apply	Include a new rule that specifically provides for earthworks associated with the establishment, operation or maintenance of regionally significant infrastructure. Or delete and revert to Operative NRP..		Accept

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								to large scale earthworks that provide for regionally significant infrastructure.			
	Wellington International Airport Limited	FS23.1321	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought except for where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Wellington International Airport Limited	FS47.265	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that clause (b) and related discretionary matter (8) should be deleted. Meridian would support a separate restricted discretionary activity rule for large scale earthworks for regionally significant infrastructure;	Allow	Allow S101.068.	Accept in part
S101.069	Wellington International Airport Limited (S101)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.	Oppose		Notes most of submitters earthwork activities will be captured by this rule. For the reasons set out in submission on Policy WH.P31, the submitter opposes the rule and considers it should be deleted in its entirety. As an alternative, considers that a separate restricted discretionary earthworks rule should apply to large scale earthworks that provide for regionally significant infrastructure.	Develop a new restricted discretionary earthworks rule should apply to large scale earthworks that provide for the establishment, operation or maintenance of regionally significant infrastructure that does not include a close down period. Or delete and revert to Operative NRP.		Reject
	Wellington International Airport Limited	FS23.1322	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought except for where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Wellington International Airport Limited	FS47.294	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Support in part	Meridian agrees the non-complying activity status is not necessary or appropriate;	Allow in part	Allow S101.069 as alternative relief to providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.	Accept
S105.002	Hannah Bridget Gray (No2) Trust (S105)			2 Interpretation	Earthworks	Amend		Drain and culvert maintenance often requires clearing sediment or earth - similar to installing a fence post, but should not be considered earthworks.	For Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua only: The alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, and disturbance of land for the installation of fence posts or clearing of drains and culverts. Except that, for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20, 'earthworks' has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.		Accept in part
S116.074	Taumata Arowai (S116)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted	Amend		Notes the WSA framework for identification, monitoring and management of risks to water sources is intended to work together with resource management legislation. Notes that changes are	Amend provisions as appropriate to reflect legislative changes to what constitutes a drinking water supply.		Reject

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					discretionary activity.			made to rules that recognise proximity to source water intakes but that no change has been made to the reference to drinking water supplies (community drinking water supply and group drinking water supply) and these references are out of date due to the repeal of the Health (Drinking Water Amendment Act) 2007 and enactment of the WSA.			
	Taumata Arowai	FS23.642	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Submission points will assist with plan clarity and help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
S116.121	Taumata Arowai (S116)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Amend		Notes the WSA framework for identification, monitoring and management of risks to water sources is intended to work together with resource management legislation. Notes that changes are made to rules that recognise proximity to source water intakes but that no change has been made to the reference to drinking water supplies (community drinking water supply and group drinking water supply) and these references are out of date due to the repeal of the Health (Drinking Water Amendment Act) 2007 and enactment of the WSA.	Amend provisions as appropriate to reflect legislative changes to what constitutes a drinking water supply.		Reject
	Taumata Arowai	FS23.689	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Submission points will assist with plan clarity and help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
S120.008	Akatarawa Valley Residents - John Van Nortwick & Jill Van NortwickJohn & Jill Van Nortwick (S120)			2 Interpretation	Earthworks	Oppose		Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - John Van Nortwick & Jill Van NortwickJohn & Jill Van Nortwick	FS16.043	Woodridge Holdings Ltd	2 Interpretation	Earthworks		Not stated	The cost and time implications of the "Earthworks" definition do not appear to have been thought through or considered in the s32 analysis.	Allow	Provide one definition for earthworks for the region.  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.	Reject
	Akatarawa Valley Residents - John Van Nortwick & Jill Van	FS47.049	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject

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	NortwickJohn & Jill Van Nortwick							facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;			
S121.008	Akatarawa Valley Residents - Karen Wallace & Mark RobbinsKaren Wallace Mark Robbins (S121)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Karen Wallace & Mark RobbinsKaren Wallace Mark Robbins	FS47.052	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S122.008	Akatarawa Valley Residents - Paul Lambert & Steph LambertPaul & Steph Lambert (S122)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Paul Lambert & Steph LambertPaul & Steph Lambert	FS47.055	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S123.008	Akatarawa Valley Residents - Sandy CooperSandy Cooper (S123)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Sandy CooperSandy Cooper	FS47.058	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S124.008	Akatarawa Valley Residents - Fredrick			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been	Reinstate the exclusions as given to the other districts.		Reject

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	Steensma (S124)							thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.			
	Akatarawa Valley Residents - Fredrick Steensma	FS47.061	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S125.008	Akatarawa Valley Residents - Shoshanah (Shosh) Phillips (S125)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Shoshanah (Shosh) Phillips	FS47.064	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S126.008	Akatarawa Valley Residents - Russell Judd & Cecile Judd (S126)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Russell Judd & Cecile Judd	FS47.067	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S127.008	Akatarawa Valley Residents - Johanna Overdiep & Steve Sturgess (S127)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Johanna	FS47.070	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation,	Allow	Allow the identified submission points S120.008 to S150.008	Reject

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	Overdiep & Steve Sturgess							maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;		and S152.008 to S174.008.	
S128.008	Akatarawa Valley Residents - Joany Grima & Allen Rockell (S128)			2 Interpretation	Earthworks	Oppose		Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Joany Grima & Allen Rockell	FS47.073	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S129.008	Akatarawa Valley Residents - Keith Budd & Liz Budd (S129)			2 Interpretation	Earthworks	Oppose		Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Keith Budd & Liz Budd	FS47.076	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S130.008	Akatarawa Valley Residents - Pete Clark (S130)			2 Interpretation	Earthworks	Oppose		Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Pete Clark	FS47.050	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S131.008	Akatarawa Valley Residents - Gillian Taylor &			2 Interpretation	Earthworks	Oppose		Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other	Reinstate the exclusions as given to the other districts.		Reject



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Chris Taylor (S131)							districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.			
	Akatarawa Valley Residents - Gillian Taylor & Chris Taylor	FS47.053	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S132.008	Akatarawa Valley Residents - Hannah Dawson & Ryan Dawson (S132)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Hannah Dawson & Ryan Dawson	FS47.056	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S133.008	Akatarawa Valley Residents - Len Drabble (S133)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Len Drabble	FS47.059	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S134.008	Akatarawa Valley Residents - Graeme Allan (S134)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Graeme Allan	FS47.062	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is	Allow	Allow the identified submission points S120.008 to S150.008	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;		and S152.008 to S174.008.	
S135.008	Akatarawa Valley Residents - Joshua Wood (S135)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Joshua Wood	FS47.065	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S136.008	Akatarawa Valley Residents - Micayla Wood (S136)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Micayla Wood	FS47.068	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S137.008	Akatarawa Valley Residents - Jonathan Wood (S137)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Jonathan Wood	FS47.071	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S138.008	Akatarawa Valley Residents			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the	Reinstate the exclusions as given to the other districts.		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	- Tony Wood & Helen Wood (S138)							exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.			
	Akatarawa Valley Residents - Tony Wood & Helen Wood	FS47.074	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S139.008	Akatarawa Valley Residents - Glenda Arnold (S139)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Glenda Arnold	FS47.077	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S140.008	Akatarawa Valley Residents - Janet Collins (S140)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Janet Collins	FS47.051	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S141.008	Akatarawa Valley Residents - George Hare (S141)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Akatarawa Valley Residents - George Hare	FS47.054	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S142.008	Akatarawa Valley Residents - Paul Arnold (S142)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Paul Arnold	FS47.057	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S143.008	Akatarawa Valley Residents - Chilly Brook Trust (Mary Redington) (S143)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Chilly Brook Trust (Mary Redington)	FS47.060	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S144.008	Akatarawa Valley Residents - Gaylene Ward & Mike Ward (S144)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Gaylene Ward & Mike Ward	FS47.063	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								Generation 2011 and the National Policy Statement for Electricity Transmission 2008;			
S145.008	Akatarawa Valley Residents - Nigel Parry & Judy Parry (S145)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Nigel Parry & Judy Parry	FS47.066	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S146.008	Akatarawa Valley Residents - Leanna Jackson & Carl Burns (S146)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Leanna Jackson & Carl Burns	FS47.069	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S147.008	Akatarawa Valley Residents - Joline Fowke & Owen Fowke (S147)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Joline Fowke & Owen Fowke	FS47.072	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S148.008	Akatarawa Valley Residents - Paul Baker (S148)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm	Reinstate the exclusions as given to the other districts.		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								accessways, and that GWRC has not provided justification or evidence for this change.			
	Akatarawa Valley Residents - Paul Baker	FS47.075	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S149.008	Akatarawa Valley Residents - Allan MacDonald (S149)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Allan MacDonald	FS47.078	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S150.008	Akatarawa Valley Residents - Phyllis Strachan (S150)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Phyllis Strachan	FS47.079	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S151.005	Wellington Water Ltd (S151)			General comments	General comments - earthworks	Oppose		Considers the winter shutdown for earthworks will make delivery of any large-scale programme of work impracticable.	Seeks an exemption for regionally significant infrastructure from the winter shutdown for earthworks		Reject
	Wellington Water Ltd	FS20.084	Transpower New Zealand Limited	General comments	General comments - earthworks		Support	The request is generally consistent with Transpower’s submissions on the provisions associated with earthworks.	Allow	Transpower supports the request to exempt regionally significant infrastructure from the winter shutdown for earthworks.	Reject
	Wellington Water Ltd	FS23.1332	Forest & Bird	General comments	General comments - earthworks		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought except for where points are consistent with Forest & Bird’s submission	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										points and specific relief.	
	Wellington Water Ltd	FS31.094	Wellington International Airport Limited	General comments	General comments - earthworks		Support	WIAL supports this relief to the extent that it is consistent with WIAL's submission seeking the inclusion of new earthwork provisions for regionally significant infrastructure.	Allow	Seeks and exemption for regionally significant infrastructure from winter shutdown works.	Reject
S151.018	Wellington Water Ltd (S151)			2 Interpretation	Earthworks	Oppose		Supports the earthworks definition regarding the areas that fall outside Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua. Considers the removal of exclusions for earthworks in Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua will result in a large number of consents for minor earthworks activities in these areas, including in relation to three waters infrastructure. Considers this is likely to have a significant and prohibitive impact on Wellington Water's ability to repair and maintain its network in a timely and cost effective manner.	<p>Retain the proposed earthworks definition (outside Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua) across the full region and delete the earthworks definition which relates to Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.</p> <p>Proposed definition revisions as follows:</p> <p>Earthworks For Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua only: The alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, and disturbance of land for the installation of fence posts. Except that, for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20, 'earthworks' has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.</p> <p>For all other whaitua: The disturbance of a land surface from the time soil is first disturbed on a site until the time the site is stabilised. Earthworks includes blading, contouring, ripping, moving, removing, placing or replacing soil or earth, by excavation, or by cutting or filling operations, or by root raking. Earthworks do not include:</p> <p>(a) cultivation of the soil for the establishment of crops or pasture, and (b) the harvesting of crops, and (c) thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and (d) the construction, repair, upgrade or maintenance of: (i) pipelines, and (ii) electricity lines and their support structures, including the National Grid, and (iii) telecommunication structures or lines, and (iv) radio communication structures, and (v) firebreaks or fence lines, and (vi) a bore or geotechnical investigation bore, and (e) repair or maintenance of existing roads and tracks, and airfield runways, taxiways, and parking aprons for aircraft, and (f) maintenance of orchards and shelterbelts, and (g) domestic gardening, and (h) repair, sealing or resealing of a road, footpath, driveway,</p>		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									and (i) discharge of cleanfill material to a cleanfill area"		
	Wellington Water Ltd	FS20.085	Transpower New Zealand Limited	2 Interpretation	Earthworks		Support	The request is generally consistent with Transpower's submissions on the definition of "earthworks". Specifically, this request would enable the exemptions for regionally significant infrastructure under clause (d) of the operative definition to continue to apply.	Allow	Transpower supports the request to retain the operative definition of "earthworks" (and delete the proposed definition of "earthworks").	Reject
	Wellington Water Ltd	FS23.1345	Forest & Bird	2 Interpretation	Earthworks		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought except for where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Wellington Water Ltd	FS47.103	Meridian Energy Limited	2 Interpretation	Earthworks		Support in part	Meridian agrees that the removal of the exclusions will result in a large number of consents for minor earthworks activities and will have a significant impact on the ability of infrastructure generally, including regionally significant infrastructure, to repair and maintain networks in a cost effective manner. Meridian considers the listed exclusions should be disjunctive (through use of the expression 'or' instead of 'and' in the list of exclusions);	Allow in part	Allow S151.018 in part by retaining the listed exclusions but amend the list by inserting the word 'or' instead of 'and'.	Reject
S151.089	Wellington Water Ltd (S151)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Amend		Considers this excessive given the scale of work that needs to be delivered for Te Mana o te Wai and an exemption is required for Regionally Significant Infrastructure	Amend to provide an exemption for Regionally Significant Infrastructure. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.		Reject
	Wellington Water Ltd	FS20.086	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	The request is generally consistent with Transpower's submissions on policy WH.P31.	Allow	Should the winter shut down of earthworks set out in policy WH.P31 be retained, Transpower supports the request to provide an exemption for regionally significant infrastructure from the policy.	Reject
	Wellington Water Ltd	FS23.1416	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought except for where points are consistent with Forest & Bird's submission points and specific relief.	Accept
	Wellington Water Ltd	FS31.058	Wellington International Airport Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	WIAL agrees that an exemption should be provided for regionally significant infrastructure, as set out in WIAL's submission.	Allow	Amend to provide an exemption for Regionally Significant Infrastructure.	Reject
S151.099	Wellington Water Ltd (S151)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		Notes earthworks activities undertaken by Wellington Water with minor effects would be unable to meet the permitted activity conditions of proposed Rule WH.R23 including minor repairs and maintenance of three waters infrastructure. Notes this proposed rule may mean that hundreds of resource consent	Amend to reinstate the exemptions for certain earthworks activities as exist for 'other Whaitua', including for the thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and for the		Accept in part



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								applications would be required per annum for minor earthworks activities associated with burst pipe repairs.	construction, repair, upgrade or maintenance of pipelines. Any consequential amendments, to other relevant provisions, which are in general accordance with this request. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.		
	Wellington Water Ltd	FS20.087	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Transpower considers the exemptions sought to earthworks rule WH.R23 better recognise and provide for the maintenance, upgrading, or development of regionally significant infrastructure.	Allow	Transpower supports the request to reinstate exemptions for certain earthworks activities under rule WH.R23, including for the thrusting, boring, trenching, or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines.	Accept in part
	Wellington Water Ltd	FS23.1426	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought except for where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Wellington Water Ltd	FS33.024	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Consider it appropriate to carry over existing exemptions for minor earthworks such as those required for the laying, maintenance, upgrade and replacement of underground infrastructure and repair of existing paved areas. Rule WH.R23 as notified will result in consent requirements and associated costs for significant numbers of earthworks activities and is not reflective of the level of potential contaminates generated by small-scale earthworks undertaken with best practice erosion and sediment control measures in place.	Allow	Allow submission and make the changes sought.	Accept in part
	Wellington Water Ltd	FS31.082	Wellington International Airport Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support in part	WIAL supports the relief to the extent that it addresses the matters raised in WIAL's original submission, particularly with respect to the definition of earthworks and the exclusions afforded to the Airport.	Allow in part	Amend to reinstate the exemptions for certain earthworks activities as exist for 'other Whaitua',	Reject
S151.100	Wellington Water Ltd (S151)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		Provide an exemption for Regionally Significant Infrastructure to reflect the volume of work that needs to be undertaken for RSI	Provide a exemption to (b) for RSI. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.		Reject
	Wellington Water Ltd	FS20.088	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	While Transpower has sought that clause (b) of the rule is deleted, as an alternative, Transpower would support an exemption from clause (b) for regionally significant infrastructure, as providing for such an exemption would appropriately recognise and provide for earthworks associated with the maintenance, upgrading, and development of regionally significant infrastructure.	Allow	Should the winter shut down of earthworks set out in rule WH.R24 be retained, Transpower supports the request to provide an exemption for regionally significant infrastructure from clause (b) of the rule.	Reject
	Wellington Water Ltd	FS23.1427	Forest & Bird	8 Whaitua Te	Rule WH.R24:		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of	Disallow	Oppose the whole of the submission and all	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				Whanganui-a-Tara	Earthworks – restricted discretionary activity.			waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).		relief sought except for where points are consistent with Forest & Bird's submission points and specific relief.	
	Wellington Water Ltd	FS28.165	Waka Kotahi NZ Transport Agency	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Waka Kotahi provides RSI.	Allow	Not stated	Reject
	Wellington Water Ltd	FS47.266	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support in part	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that clause (b) and related discretionary matter (8) should be deleted. Meridian would support a separate restricted discretionary activity rule for large scale earthworks for regionally significant infrastructure;	Allow in part	Allow S151.100.	Reject
	Wellington Water Ltd	FS31.084	Wellington International Airport Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	WIAL supports the relief to the extent that it addresses the matters raised in WIAL's original submission	Allow	Provide an exemption to (b) for RSI.	Reject
S151.122	Wellington Water Ltd (S151)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Amend		Considers this excessive given the scale of work that needs to be delivered for Te Mana o te Wai and an exemption is required for Regionally Significant Infrastructure	Amend to provide an exemption for Regionally Significant Infrastructure. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.		Reject
	Wellington Water Ltd	FS20.089	Transpower New Zealand Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	The request is generally consistent with Transpower's submissions on policy P.P29.	Allow	Should the winter shut down of earthworks set out in policy P.P29 be retained, Transpower supports the request to provide an exemption for regionally significant infrastructure from the policy.	Reject
	Wellington Water Ltd	FS23.1449	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought except for where points are consistent with Forest & Bird's submission points and specific relief.	Accept
	Wellington Water Ltd	FS47.326	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support in part	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow in part	Allow S151.122 by deleting Policy P.P29.	Accept in part
S151.130	Wellington Water Ltd (S151)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Amend		Notes earthworks activities undertaken by Wellington Water with minor effects would be unable to meet the permitted activity conditions of proposed Rule WH.R22 including minor repairs and maintenance of three waters infrastructure. Notes that this proposed rule may mean that hundreds of resource consent applications would be required per annum for minor earthworks activities associated with burst pipe repairs.	Amend Rule to reinstate the exemptions for certain earthworks activities as exist for 'other Whaitua', including for the thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines. Any consequential amendments, to other relevant provisions, which are in general accordance with this request.		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Wellington Water Ltd	FS20.090	Transpower New Zealand Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Transpower considers the exemptions sought to earthworks rule P.R22 better recognise and provide for the maintenance, upgrading, or development of regionally significant infrastructure.	Allow	Transpower supports the request to reinstate exemptions for certain earthworks activities under rule P.R22, including for the thrusting, boring, trenching, or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines.	reject
	Wellington Water Ltd	FS23.1457	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought except for where points are consistent with Forest & Bird's submission points and specific relief.	Accept
	Wellington Water Ltd	FS33.041	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Consider it appropriate to carry over existing exemptions for minor earthworks such as those required for the laying, maintenance, upgrade and replacement of underground infrastructure and repair of existing paved areas. Rule WH.R23 as notified will result in consent requirements and associated costs for significant numbers of earthworks activities and is not reflective of the level of potential contaminates generated by small- scale earthworks undertaken with best practice erosion and sediment control measures in place.	Allow	Allow submission and make the changes sought.	Reject
	Wellington Water Ltd	FS36.033	Wellington City Council	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Consistent with Wellington City Council's position on the matter.	Allow	Not stated	Reject
	Wellington Water Ltd	FS47.392	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Meridian agrees the deletion of the operative NRP exemptions is problematic for regionally significant infrastructure;	Allow	Allow S151.130 to the extent consistent with Meridian's other further submission points.	Accept in part
S151.131	Wellington Water Ltd (S151)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Amend		Provide an exemption for Regionally Significant Infrastructure to reflect the volume of work that needs to be undertaken for RSI	Provide an exemption to (b) for RSI. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.		Reject
	Wellington Water Ltd	FS20.091	Transpower New Zealand Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	While Transpower has sought that clause (b) of the rule is deleted, as an alternative, Transpower would support an exemption from clause (b) for regionally significant infrastructure, as providing for such an exemption would appropriately recognise and provide for earthworks associated with the maintenance, upgrading, and development of regionally significant infrastructure.	Allow	Should the winter shut down of earthworks set out in rule P.R23 be retained, Transpower supports the request to provide an exemption for regionally significant infrastructure from clause (b) of the rule.	Reject
	Wellington Water Ltd	FS23.1458	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought except for where points are consistent with Forest & Bird's submission points and specific relief.	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Wellington Water Ltd	FS28.174	Waka Kotahi NZ Transport Agency	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Changes proposed will improve clarity of the provisions.	Allow	Not stated	reject
	Wellington Water Ltd	FS47.406	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support in part	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that clause (b) and related discretionary matter (8) should be deleted. Meridian would support a separate restricted discretionary activity rule for large scale earthworks for regionally significant infrastructure;	Allow in part	Allow S151.131.	Reject
S152.008	Akatarawa Valley Residents - John Raffan & Heather Raffan (S152)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - John Raffan & Heather Raffan	FS47.084	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S153.008	Akatarawa Valley Residents - Redington Family Trust (Mary Redington) (S153)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Redington Family Trust (Mary Redington)	FS47.087	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S154.008	Akatarawa Valley Residents - Ash Barker & Kes Barker (S154)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Ash Barker & Kes Barker	FS47.090	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								Generation 2011 and the National Policy Statement for Electricity Transmission 2008;			
S155.008	Akatarawa Valley Residents - Susan Davidson (S155)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Susan Davidson	FS47.093	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S156.008	Akatarawa Valley Residents - John Bryce (S156)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - John Bryce	FS47.095	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S157.008	Akatarawa Valley Residents - Dr Patricia Laing (S157)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Dr Patricia Laing	FS47.097	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S158.008	Akatarawa Valley Residents - Erica Dawson (S158)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm	Reinstate the exclusions as given to the other districts.		Reject

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								accessways, and that GWRC has not provided justification or evidence for this change.			
	Akatarawa Valley Residents - Erica Dawson	FS47.099	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S159.008	Akatarawa Valley Residents - Bruce Stevens & Theresa Stevens (S159)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Bruce Stevens & Theresa Stevens	FS47.101	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S160.008	Akatarawa Valley Residents - Dr Harold Cuffe (S160)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Dr Harold Cuffe	FS47.080	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S161.004	GILLIES GROUP MANAGEMENT LTD (S161)			General comments	General comments - urban development	Oppose		Opposes non-complying activity status for winter earthworks. Considers current approach to managing winter earthworks is effective. Considers that a blanket non-complying activity status does not take into account the scale, nature or duration of works. Considers the requirement to stabilise earthworks and implement sediment controls prior to shut down may not be feasible resulting in unintended environmental outcomes. Concerned the prescribed shut down period may not align with specific site conditions. Considers blanket restrictions do not effectively address the diversity of different sites and applicants which demonstrate the required management of winter works should be supported to avoid delays of housing supply.	Not stated		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S161.015	GILLIES GROUP MANAGEMENT LTD (S161)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose		Opposes non-complying activity status for winter earthworks. Notes that large storm events can occur throughout the year, resulting in large sediment discharges. Considers that existing management of winter earthworks should be retained, through a separate approval process against established criteria, with oversight from compliance officers. Notes that current practice enables consideration of the track record of works completed before winter. Considers that a blanket non-complying activity status does not take into account the scale, nature or duration of works. Considers the requirement to stabilise earthworks and implement sediment controls prior to shut down is not feasible in all situations, resulting in perverse environmental outcomes. Concerned the prescribed shut down period may not align with specific site conditions. Considers blanket restrictions do not effectively address the diversity of different sites. Considers that applicants which demonstrate the required management of winter works should be supported to avoid delays of housing supply.	Delete policy		Accept in part
	GILLIES GROUP MANAGEMENT LTD	FS16.091	Woodridge Holdings Ltd	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Not stated	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. 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.	Allow	Delete policy and make earthworks great than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	GILLIES GROUP MANAGEMENT LTD	FS22.027	Cannon Point Development Limited (Ltd.)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Agree with relief sought and supporting reasons as they generally align with Cannon Point Development Ltd.'s submission.	Allow	Support the relief sought to delete this policy. Support all the submitter's reasoning.	Accept
	GILLIES GROUP MANAGEMENT LTD	FS47.179	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S161.015 by deleting Policy WH.P31.	Accept
S161.024	GILLIES GROUP MANAGEMENT LTD (S161)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		Considers the "and" after clause (b) means earthworks not on a farm require consent and is unlikely the intent of the rule.	Rule WH.R23: Earthworks – permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									<p>stabilised within six months after completion of the earthworks, and</p> <p>(g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and</p> <p>(h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).</p>		
S161.025	GILLIES GROUP MANAGEMENT LTD (S161)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		<p>Opposes non-complying activity status for winter earthworks. Notes that large storm events can occur throughout the year, resulting in large sediment discharges. Considers current approach to managing winter earthworks is effective. Considers that a blanket non-complying activity status does not take into account the scale, nature or duration of works. Considers the requirement to stabilise earthworks and implement sediment controls prior to shut down may not be feasible resulting in unintended environmental outcomes. Concerned the prescribed shut down period may not align with specific site conditions. Considers blanket restrictions do not effectively address the diversity of different sites and applicants which demonstrate the required management of winter works should be supported to avoid delays of housing supply.</p>	<p>Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:</p> <p>Rule WH.R24: Earthworks – restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met:</p> <p>(a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m<sup>3</sup>, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m<sup>3</sup>, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than:</p> <p>(i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or</p> <p>(ii) 30% in any other river, and</p> <p>(b) earthworks shall not occur between 1st June and 30th September in any year.</p>		Reject
	GILLIES GROUP MANAGEMENT LTD	FS16.144	Woodridge Holdings Ltd	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Not stated	<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. Each job should be treated on its merits and conditioned accordingly, and one of the matters for discretion is the "timing of the works". The matter for discretion, "The proportion of unestablished land in the catchment.", is vague and gives an applicant no idea</p>	Allow	Remove (b) from WH.R24 and delete WH.R25 so that earthworks are not a non-complying activity.	Reject



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								what % of disturbance is likely to be acceptable per catchment and makes the applicant reliant upon the actions of others. 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. 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. 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.			
	GILLIES GROUP MANAGEMENT LTD	FS22.043	Cannon Point Development Limited (Ltd.)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support in part	Support in part because whilst Cannon Point Development Ltd.'s submission seeks deletion of clause (b), it also seeks the deletion of mater of discretion (8) and considers deletion of both parts are required to adequately address its concerns.	Allow in part	Support relief sought to delete clause (b). Support all reasons in relation to this and impacts on the provision of housing supply.	Reject
	GILLIES GROUP MANAGEMENT LTD	FS47.267	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S161.025 and delete related discretionary matter (8).	Reject
S161.030	GILLIES GROUP MANAGEMENT LTD (S161)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose		Opposes non-complying activity status for winter earthworks. Notes that large storm events can occur throughout the year, resulting in large sediment discharges. Considers current approach to managing winter earthworks is effective. Considers that a blanket non-complying activity status does not take into account the scale, nature or duration of works. Considers the requirement to stabilise earthworks and implement sediment controls prior to shut down may not be feasible resulting in unintended environmental outcomes. Concerned the prescribed shut down period may not align with specific site conditions. Considers blanket restrictions do not effectively address the diversity of different sites and applicants which demonstrate the required management of winter works should be supported to avoid delays of housing supply.	Delete policy		Accept
	GILLIES GROUP MANAGEMENT LTD	FS48.041	Ministry of Housing and Urban Development (HUD)	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Consider that a blanket exclusion to winter earthworks is too blunt an approach that will impose significant costs to developments. An effects management approach that can consider the likely risk of the site (such as topography, slope soil type, scale and duration of the work) is more appropriate. High rainfall events can occur at any time of year and a blanket ban of winter earthworks does not recognise or manage this.	Allow	Delete policy	Accept
	GILLIES GROUP MANAGEMENT LTD	FS47.327	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S161.030.	Accept
S161.039	GILLIES GROUP MANAGEMENT LTD (S161)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Amend		Considers the "and" after clause (b) means earthworks not on a farm require consent and is unlikely the intent of the rule.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:  Rule P.R22: Earthworks – permitted activity Earthworks is a permitted activity, provided the following conditions are		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).		
	GILLIES GROUP MANAGEMENT LTD	FS16.226	Woodridge Holdings Ltd	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Not stated	Subclause (g) cannot be met 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 lower rates, even when the earthworks area is stabilised. No earthworks will meet the permitted activity criteria, regardless of size and treatment.	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.”  Amend Items (c)(1v) and (c)(v) so that they allow an appropriate level of SS in any stormwater discharge	Accept
S161.040	GILLIES GROUP MANAGEMENT LTD (S161)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Amend		Opposes non-complying activity status for winter earthworks. Notes that large storm events can occur throughout the year, resulting in large sediment discharges. Considers current approach to managing winter earthworks is effective. Considers that a blanket non-complying activity status does not take into account the scale, nature or duration of works. Considers the requirement to stabilise earthworks and implement sediment controls prior to shut down may not be feasible resulting in unintended environmental	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:  Rule P.R23: Earthworks – restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								outcomes. Concerned the prescribed shut down period may not align with specific site conditions. Considers blanket restrictions do not effectively address the diversity of different sites and applicants which demonstrate the required management of winter works should be supported to avoid delays of housing supply.	enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year.		
	GILLIES GROUP MANAGEMENT LTD	FS16.230	Woodridge Holdings Ltd	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Not stated	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". 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. 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. 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 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.	Allow	Remove (b) from P.R23 and delete WH.R24 so that earthworks are a Discretionary Activity.	Reject
	GILLIES GROUP MANAGEMENT LTD	FS47.407	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that clause (b) and related discretionary matter (8) should be deleted.	Allow	Allow S161.040.	Reject
S162.008	Akatarawa Valley Residents - Phil Kirycuk (S162)			2 Interpretation	Earthworks	Oppose		Considers the definition of "Earthworks" is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Phil Kirycuk	FS47.085	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is	Allow	Allow the identified submission points S120.008 to S150.008	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;		and S152.008 to S174.008.	
S163.008	Akatarawa Valley Residents - John Simister (S163)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - John Simister	FS47.088	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S164.008	Akatarawa Valley Residents - Sarah Purdy (S164)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Sarah Purdy	FS47.091	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S165.004	Pukerua Holdings Limited (S165)			General comments	General comments - earthworks	Oppose		Opposes the non-complying resource consent requirement for winter earthworks and instead seeks the existing approach to managing winter earthworks be retained because it has proven effective. Considers it is inappropriate to applying a blanket non-complying activity status for winter works, instead assessing the project's pre-winter track record and factors such as scale, nature, duration of the works and management of works already undertaken in the applicable site. Concerns the requirement to stabilise earthworks against erosion and implement sediment controls before shutting down may not be feasible, potentially leading to unintended environmental consequences. Concerned a blanket shutdown period may not align with the diverse challenges of different sites and areas. Considers if an applicant demonstrates the ability to manage winter works effectively, such instances should be supported to prevent unnecessary delays in housing supply and delivery	The Submitter seeks the following amendments to PC1: 1. Withdrawal of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks); OR 2. Should the relief sought in point 1) not occur, the Submitter seeks the relief set in relation to specific provisions of PC1 as set out in Section 3 of the original submission; AND 3. Any other relief (including consequential relief) to give effect to the decisions sought in relation to specific provisions of PC1 as set out in Section 3 of the original submission.		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Pukerua Holdings Limited	FS47.004	Meridian Energy Limited	General comments	General comments - earthworks		Support in part	Meridian is concerned that proposed PC1 has been promulgated without consultation with all providers of regionally significant infrastructure and without proper consideration of the particular operational and functional needs of regionally significant infrastructure, including Meridian's lawfully established renewable electricity generation wind farms. Proposed PC1 raises potentially significant adverse operational impacts for regionally significant infrastructure, including renewable electricity generation activities, that conflict with the National Policy Statements for Renewable Electricity Generation and Electricity Generation. Proposed PC1 also overrides or upends, without reasonable cause, provisions in the operative NRP for regionally significant infrastructure that were settled by agreement (including the agreement of GWRC) only recently through mediation of appeals on the NRP. Meridian considers that the particular issues of conflict raised in the following submission are capable of resolution by providing appropriate exclusions or exemptions for regionally significant infrastructure (and particularly for lawfully established existing regionally significant infrastructure). These exclusion or exemption provisions are necessary in order for the region's urban and rural communities to function effectively and efficiently, and to enable achievement of the nation's objectives relating to adaptation to climate change. These objectives include enabling increased electricity generation from renewable sources;	Allow in part	Allow the submission points and withdraw PC1 or, as alternative relief, make the amendments to PC1 detailed in the following further submission points (or such further or other relief as will achieve the outcome sought by the submission points).	Accept in part
S165.015	Pukerua Holdings Limited (S165)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose		Opposes the requirement to seek a non-complying resource consent to undertake winter earthworks. Considers large rain events that produce larger sediment pulses can occur any time, not just in the winter period. Considers the current practice for managing winter earthworks should be retained and requiring a non-complying activity status for winter works does not take into account the scale, nature or duration of the works or site-specific conditions. Also concerned that stabilising earthworks prior to the shutdown may not always be feasible and may lead to perverse environmental outcomes. Considers blanket restrictions are not the most effective approach to address site-specific challenges and where an applicant shows they can meet winter work requirements, they should be approved to avoid housing supply delay.	Delete policy: Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).		Accept
	Pukerua Holdings Limited	FS22.028	Cannon Point Development Limited (Ltd.)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Agree with relief sought and supporting reasons as they generally align with Cannon Point Development Ltd.'s submission.	Allow	Support the relief sought to delete this policy. Support all the submitter's reasoning.	Accept
	Pukerua Holdings Limited	FS47.180	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S165.015 by deleting Policy WH.P31.	Accept
S165.024	Pukerua Holdings Limited (S165)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		Notes the 'and' after clause b means that any earthworks that are not on a farm now require consent which is unlikely the intent of the rule.	Amend rule as follows: Rule WH.R23: Earthworks – permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									(b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122,R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).		
S165.025	Pukerua Holdings Limited (S165)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		Opposes the requirement to seek a non-complying resource consent to undertake winter earthworks. Considers large rain events that produce larger sediment pulses can occur any time, not just in the winter period. Considers the current practice for managing winter earthworks should be retained and requiring a non-complying activity status for winter works does not take into account the scale, nature or duration of the works or site-specific conditions. Also concerned that stabilising earthworks prior to the shutdown may not always be feasible and may lead to perverse environmental outcomes. Considers blanket restrictions are not the most effective approach to address site-specific challenges and where an applicant shows they can meet winter work requirements, they should be approved to avoid housing supply delay	water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year.		Accept in part
	Pukerua Holdings Limited	FS22.044	Cannon Point Development Limited (Ltd.)	8 Whaitua Te	Rule WH.R24: Earthworks –		Support in part	Support in part because whilst Cannon Point Development Ltd.'s submission seeks deletion of clause (b), it also seeks the deletion of mater of	Allow in part	Support relief sought to delete clause (b). Support all reasons in	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				Whanganui-a-Tara	restricted discretionary activity.			discretion (8) and considers deletion of both parts are required to adequately address its concerns.		relation to this and impacts on the provision of housing supply.	
	Pukerua Holdings Limited	FS47.268	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S165.025 and delete related discretionary matter (8).	Accept in part
S165.030	Pukerua Holdings Limited (S165)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose		Opposes the requirement to seek a non-complying resource consent to undertake winter earthworks. Considers large rain events that produce larger sediment pulses can occur any time, not just in the winter period. Considers the current practice for managing winter earthworks should be retained and requiring a non-complying activity status for winter works does not take into account the scale, nature or duration of the works or site-specific conditions. Also concerned that stabilising earthworks prior to the shutdown may not always be feasible and may lead to perverse environmental outcomes. Considers blanket restrictions are not the most effective approach to address site-specific challenges and where an applicant shows they can meet winter work requirements, they should be approved to avoid housing supply delay.	Delete policy		Accept
	Pukerua Holdings Limited	FS47.328	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S165.030	Accept
S165.039	Pukerua Holdings Limited (S165)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Amend		Notes the ‘and’ after clause b means that any earthworks that are not on a farm now require consent which is unlikely the intent of the rule.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule P.R22: Earthworks – permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).		
S165.040	Pukerua Holdings Limited (S165)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Amend		Opposes the requirement to seek a non-complying resource consent to undertake winter earthworks. Considers large rain events that produce larger sediment pulses can occur at any time - and have become more erratic due to climate change.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point: Rule P.R23: Earthworks – restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year.		Reject
	Pukerua Holdings Limited	FS47.408	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that clause (b) and related discretionary matter (8) should be deleted.	Allow	Allow S165.040.	Accept
S166.008	Akatarawa Valley Residents - Dr Anna De Raadt & Roger Fairclough (S166)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Dr Anna De Raadt & Roger Fairclough	FS47.096	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;			
S167.008	Akatarawa Valley Residents - Allan and Sarah Kelly (S167)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Allan and Sarah Kelly	FS47.098	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S168.008	Akatarawa Valley Residents - Barry Hearfield & Carol McGhie (S168)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Barry Hearfield & Carol McGhie	FS47.100	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S169.010	KORU HOMES NZ LIMITED (S169)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose		Opposes requirement for a non-complying resource consent to undertake winter earthworks. Considers large rain events at any time cause larger pulses of sediment than discharges of sediment over the winter period and the current practice for managing winter earthworks with GWRC oversight is sufficient. Considers this existing practice should be retained where it is managed through a separate approvals process against established GWRC criteria. Considers the non-complying activity status doesn't consider scale, nature or duration of the works or specific site conditions. Concerned that stabilising earthworks before the shutdown period may not always be feasible and may result in other perverse environmental outcomes. Considers blanket restrictions are not the most effective approach to address diverse challenges on different sites and areas. Considers that where applicants demonstrate that winter works can be managed, this should be supported to avoid unnecessary delay of housing supply	Delete Policy WH.P31		Accept
	KORU HOMES NZ LIMITED	FS47.181	Meridian Energy Limited	8 Whaitua Te	Policy WH.P31: Winter shut		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S169.010 by deleting Policy WH.P31.	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S169.019	KORU HOMES NZ LIMITED (S169)			Whanganui-a-Tara 8 Whaitua Te Whanganui-a-Tara	down of earthworks. Rule WH.R23: Earthworks – permitted activity.	Amend		Concerned the ‘and’ after clause b means that any earthworks that are not on a farm now require consent which is unlikely the intent of the rule.	Amend rule: Rule WH.R23: Earthworks – permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).		Accept
S169.020	KORU HOMES NZ LIMITED (S169)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		Opposes requirement for a non-complying resource consent to undertake winter works. Considers large rain events at any time cause larger pulses of sediment than discharges of sediment over the winter period and the current practice for managing winter earthworks with GWRC oversight is sufficientConcerned the blanket non-complying activity status does not consider the scale, nature or duration of the work.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:  Rule WH.R24: Earthworks – restricted discretionary activity  Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									in the receiving water at or about the point of discharge exceeds 100g/m <sup>3</sup> , the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year.		
	KORU HOMES NZ LIMITED	FS22.045	Cannon Point Development Limited (Ltd.)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support in part	Support in part because whilst Cannon Point Development Ltd.'s submission seeks deletion of clause (b), it also seeks the deletion of mater of discretion (8) and considers deletion of both parts are required to adequately address its concerns.	Allow in part	Support relief sought to delete clause (b). Support all reasons in relation to this.	Reject
	KORU HOMES NZ LIMITED	FS47.269	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S169.020 and delete related discretionary matter (8).	Reject
S169.025	KORU HOMES NZ LIMITED (S169)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose		Opposes requirement for a non-complying resource consent to undertake winter earthworks. Considers large rain events at any time cause larger pulses of sediment than discharges of sediment over the winter period and the current practice for managing winter earthworks with GWRC oversight is sufficient. Considers this existing practice should be retained where it is managed through a separate approvals process against established GWRC criteriaConsiders the non-complying activity status doesn't consider scale, nature or duration of the works or specific site conditions.	Delete Policy P.P29		Accept
	KORU HOMES NZ LIMITED	FS16.170	Woodridge Holdings Ltd	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Not stated	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.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.	Allow	Delete policy and make earthworks greater than 3,000m <sup>2</sup> between 1 June and 30 September a Discretionary Activity.	Accept
	KORU HOMES NZ LIMITED	FS47.329	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S169.025.	Accept
S169.034	KORU HOMES NZ LIMITED (S169)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Amend		Concerned the 'and' after clause b means that any earthworks that are not on a farm now require consent which is unlikely the intent of the rule.	No change required		Accept
S169.035	KORU HOMES NZ LIMITED (S169)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Amend		Opposes requirement for a non-complying resource consent to undertake winter earthworks. Considers large rain events at any time cause larger pulses of sediment than discharges of sediment over the winter period and the current practice for managing winter earthworks with GWRC oversight is sufficient. Considers this existing practice should be retained where it is managed through a separate approvals process against established GWRC criteriaConsiders the non-complying activity status doesn't consider scale, nature or duration of the works or specific site conditions. Concerned that stabilising earthworks	Amend Rule P.R23 to remove condition b: (b) earthworks shall not occur between 1st June and 30th September in any year.		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								before the shutdown period may not always be feasible and may result in other perverse environmental outcomes. Considers blanket restrictions are not the most effective approach to address diverse challenges on different sites and areas. Considers that where applicants demonstrate that winter works can be managed, this should be supported to avoid unnecessary delay of housing supply			
	KORU HOMES NZ LIMITED	FS47.409	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that clause (b) and related discretionary matter (8) should be deleted.	Allow	Allow S169.035.	Reject
S169.049	KORU HOMES NZ LIMITED (S169)			General comments	General comments - earthworks	Not Stated		Opposes requirement for a non-complying resource consent to undertake winter earthworks. Considers large rain events at any time cause larger pulses of sediment than discharges of sediment over the winter period and the current practice for managing winter earthworks with GWRC oversight is sufficient. Considers this existing practice should be retained where it is managed through a separate approvals process against established GWRC criteria. Considers the non-complying activity status doesn't consider scale, nature or duration of the works or specific site conditions. Concerned that stabilising earthworks before the shutdown period may not always be feasible and may result in other perverse environmental outcomes. Considers blanket restrictions are not the most effective approach to address diverse challenges on different sites and areas. Considers where applicants demonstrate that winter works can be managed, this should be supported to avoid unnecessary delay of housing supply	Withdrawal of PC1 in its entirety to allow for a more comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks); OR 2. Should the relief sought in point 1) not occur, the Submitter seeks the relief set out in submission; AND 3. Any other relief (including consequential relief) to give effect to the decisions sought in submission;		Accept in part
	KORU HOMES NZ LIMITED	FS47.013	Meridian Energy Limited	General comments	General comments - earthworks		Support in part	Meridian is concerned that proposed PC1 has been promulgated without consultation with all providers of regionally significant infrastructure and without proper consideration of the particular operational and functional needs of regionally significant infrastructure, including Meridian's lawfully established renewable electricity generation wind farms. Proposed PC1 raises potentially significant adverse operational impacts for regionally significant infrastructure, including renewable electricity generation activities, that conflict with the National Policy Statements for Renewable Electricity Generation and Electricity Generation. Proposed PC1 also overrides or upends, without reasonable cause, provisions in the operative NRP for regionally significant infrastructure that were settled by agreement (including the agreement of GWRC) only recently through mediation of appeals on the NRP. Meridian considers that the particular issues of conflict raised in the following submission are capable of resolution by providing appropriate exclusions or exemptions for regionally significant infrastructure (and particularly for lawfully established existing regionally significant infrastructure). These exclusion or exemption provisions are necessary in order for the region's urban and rural communities to function effectively and efficiently, and to enable achievement of the nation's objectives relating to adaptation to climate change. These objectives include enabling increased electricity generation from renewable sources;	Allow in part	Allow the submission points and withdraw PC1 or, as alternative relief, make the amendments to PC1 detailed in the following further submission points (or such further or other relief as will achieve the outcome sought by the submission points).	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S170.008	Akatarawa Valley Residents - Karina Fraser & Grant Fraser (S170)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Karina Fraser & Grant Fraser	FS47.081	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S171.008	Akatarawa Valley Residents - Jessica Perno & Gavin Perno (S171)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Jessica Perno & Gavin Perno	FS47.083	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S172.008	Akatarawa Valley Residents - Thomas Davies (S172)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Thomas Davies	FS47.086	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject
S173.003	ARAKURA PLAINS DEVELOPMENT LIMITED (S173)			General comments	General comments - urban development	Oppose		Opposes non-complying activity status for winter earthworks. Considers current approach to managing winter earthworks is effective. Considers that a blanket non-complying activity status does not take into account the scale, nature or duration of works. Considers the requirement to stabilise earthworks and implement sediment controls prior to shut down may not be feasible resulting in unintended environmental outcomes. Concerned the prescribed shut down	Not stated		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								period may not align with specific site conditions. Considers blanket restrictions do not effectively address the diversity of different sites and applicants which demonstrate the required management of winter works should be supported to avoid delays of housing supply.			
S173.015	ARAKURA PLAINS DEVELOPMENT LIMITED (S173)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose		Opposes non-complying activity status for winter earthworks. Notes that large storm events can occur throughout the year, resulting in large sediment discharges. Considers current approach to managing winter earthworks is effective. Considers that a blanket non-complying activity status does not take into account the scale, nature or duration of works. Considers the requirement to stabilise earthworks and implement sediment controls prior to shut down may not be feasible resulting in unintended environmental outcomes. Concerned the prescribed shut down period may not align with specific site conditions. Considers blanket restrictions do not effectively address the diversity of different sites and applicants which demonstrate the required management of winter works should be supported to avoid delays of housing supply.	Delete policy		Accept in part
	ARAKURA PLAINS DEVELOPMENT LIMITED	FS47.182	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S173.015 by deleting Policy WH.P31.	Accept
S173.024	ARAKURA PLAINS DEVELOPMENT LIMITED (S173)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		Considers the "and" after clause (b) means earthworks not on a farm require consent and is unlikely the intent of the rule.	Rule WH.R23: Earthworks – permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not exceed 3,000m <sup>2</sup> per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).		
S173.025	ARAKURA PLAINS DEVELOPMENT LIMITED (S173)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		Opposes non-complying activity status for winter earthworks. Notes that large storm events can occur throughout the year, resulting in large sediment discharges. Considers current approach to managing winter earthworks is effective. Considers that a blanket non-complying activity status does not take into account the scale, nature or duration of works. Considers the requirement to stabilise earthworks and implement sediment controls prior to shut down may not be feasible resulting in unintended environmental outcomes. Concerned the prescribed shut down period may not align with specific site conditions. Considers blanket restrictions do not effectively address the diversity of different sites and applicants which demonstrate the required management of winter works should be supported to avoid delays of housing supply.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:  Rule WH.R24: Earthworks – restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year.		Reject
	ARAKURA PLAINS DEVELOPMENT LIMITED	FS22.046	Cannon Point Development Limited (Ltd.)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support in part	Support in part because whilst Cannon Point Development Ltd.'s submission seeks deletion of clause (b), it also seeks the deletion of mater of discretion (8) and considers deletion of both parts are required to adequately address its concerns.	Allow in part	Support relief sought to delete clause (b). Support all reasons in relation to this and impacts on the provision of housing supply.	Reject
	ARAKURA PLAINS DEVELOPMENT LIMITED	FS47.270	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S173.025 and delete related discretionary matter (8).	Reject
S173.030	ARAKURA PLAINS DEVELOPMENT LIMITED (S173)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose		Opposes non-complying activity status for winter earthworks. Notes that large storm events can occur throughout the year, resulting in large sediment discharges. Considers current approach to managing winter earthworks is effective. Considers that a blanket non-complying activity status does not take into account the scale, nature or duration of works. Considers the requirement to stabilise earthworks and implement sediment controls prior to shut down may not be feasible resulting in unintended environmental	Delete policy		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								outcomes. Concerned the prescribed shut down period may not align with specific site conditions. Considers blanket restrictions do not effectively address the diversity of different sites and applicants which demonstrate the required management of winter works should be supported to avoid delays of housing supply.			
	ARAKURA PLAINS DEVELOPMENT LIMITED	FS16.171	Woodridge Holdings Ltd	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Not stated	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. 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.	Allow	Delete policy and make earthworks greater than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	ARAKURA PLAINS DEVELOPMENT LIMITED	FS47.330	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S173.030.	Accept
S173.039	ARAKURA PLAINS DEVELOPMENT LIMITED (S173)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Amend		Considers the "and" after clause (b) means earthworks not on a farm require consent and is unlikely the intent of the rule.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:  Rule P.R22: Earthworks – permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management		Accept



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).		
S173.040	ARAKURA PLAINS DEVELOPMENT LIMITED (S173)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Amend		Opposes non-complying activity status for winter earthworks. Notes that large storm events can occur throughout the year, resulting in large sediment discharges. Considers current approach to managing winter earthworks is effective. Considers that a blanket non-complying activity status does not take into account the scale, nature or duration of works. Considers the requirement to stabilise earthworks and implement sediment controls prior to shut down may not be feasible resulting in unintended environmental outcomes. Concerned the prescribed shut down period may not align with specific site conditions. Considers blanket restrictions do not effectively address the diversity of different sites and applicants which demonstrate the required management of winter works should be supported to avoid delays of housing supply.	Amend rule as follows and make any other consequential relief necessary to give effect to this submission point:  Rule P.R23: Earthworks – restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year.		Reject
	ARAKURA PLAINS DEVELOPMENT LIMITED	FS47.410	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that clause (b) and related discretionary matter (8) should be deleted.	Allow	Allow S173.040.	Reject
S174.008	Akatarawa Valley Residents - Pam Ritchie (S174)			2 Interpretation	Earthworks	Oppose		Considers the definition of “Earthworks” is confusing and can be interpreted in multiple ways, with the exceptions being more limited than those for other districts. Considers the definition has not been thought through enough to understand the cost and time implications for resource consents and other requirements, including maintenance of non-farm accessways, and that GWRC has not provided justification or evidence for this change.	Reinstate the exclusions as given to the other districts.		Reject
	Akatarawa Valley Residents - Pam Ritchie	FS47.092	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S177.005	Transpower New Zealand Limited (S177)			General comments	General comments - earthworks	Not Stated		Notes the NESETA does not regulate earthworks subject to a regional rule and therefore the earthworks rules apply to National Grid activities. Considers the earthworks policies and rules in PC1 do not provide for a reasonable level of earthworks with no permitted activity standards for earthworks at any scale. Submitter notes above notified rule framework is an error which has been corrected by GWRC under clause 16 Schedule 1 to RMA as a memo on December 6th 2023. Submitter notes their submission is made on PC1 as notified with legal effect of provisions. Considers it inefficient for almost all earthworks to require resource consent as this will create an administrative burden with little clear environmental benefits and adverse effects can be managed through permitted activity conditions. Opposes the blanket shutdown of earthworks between June-October as instances may occur where this is unavoidable and can be carefully managed mitigate adverse effects on stability and run-off. Notes the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021) provides a pathway for earthworks to be undertaken in winter months and is referred to in the earthwork provisions. Concerns the activity status pathway for earthworks insufficient to facilitate upgrading or development of the National Grid, consistent with NPSET. Concerns of uncertainty as to whether consents will be granted under s104D of the RMA, even when effects triggers can be sufficiently mitigated through consent conditions.	Not stated		Accept in part
	Transpower New Zealand Limited	FS23.748	Forest & Bird	General comments	General comments - earthworks		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S177.008	Transpower New Zealand Limited (S177)			General comments	General comments - fresh water	Not Stated		Considers it inappropriate that provisions for vegetation clearance and the permitted activity rule for earthworks have been included in the freshwater planning instrument, as the principal purpose of these provisions is to control the use of land for the purpose of soil conservation. In addition to this, these rules do not manage discharges to freshwater. Considers provisions must be reallocated to Part 1 Schedule 1 planning instrument.	Reallocate vegetation clearance and the permitted activity rule for earthworks to Part 1 Schedule 1 planning instrument.		Reject
	Transpower New Zealand Limited	FS23.751	Forest & Bird	General comments	General comments - fresh water		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S177.009	Transpower New Zealand Limited (S177)			2 Interpretation	Earthworks	Amend		Considers the rules for earthworks do not give effect to NPSET, as they do not provide for the reasonable maintenance, upgrading or development of the National Grid. Considers the operative definition exclusion for electricity lines and support structures (including the National Grid) should also apply to the proposed definition for a consistent approach. Considers the definition would be clearer by providing exclusions as a disjunctive list below the definition	Amend provision as follows:  For Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua only:  The alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								rather than embedded within definition as a conjunctive list.	constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, and disturbance of land for the installation of fence posts. Except that, for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20, 'earthworks' has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.		
								Earthworks do not include: (a) gardening (b) cultivation (c) disturbance of the land for the installation of fenceposts (d) the construction, repair, upgrade or maintenance of electricity lines and their support structures, including the National Grid (e) ...  For all other whitua: [...]			
	Transpower New Zealand Limited	FS23.752	Forest & Bird	2 Interpretation	Earthworks		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Transpower New Zealand Limited	FS47.104	Meridian Energy Limited	2 Interpretation	Earthworks		Support in part	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusion for the construction, repair, upgrade or maintenance of electricity lines and their support structures as well as for (c) cable or pipe laying, all of the activities listed in operative exclusion clause (d), (e) existing roads and tracks and (h) roads, footpaths and driveways is also important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow in part	Allow S177.009 in part by retaining all of the listed exclusions but amend the list by inserting the word 'or' instead of 'and'.	Reject
S177.015	Transpower New Zealand Limited (S177)			5.2 and 5.3 Discharges to land and water and land use rules	Rule R101: Earthworks – permitted activity.	Oppose		Seeks the operative permitted activity rule for earthworks continues to apply within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua, as rules WH.R23 and P.R22 do not provide any permitted activity threshold for earthworks smaller than 3,000m2 per property, and the operative rule provides reasonable conditions for undertaking all other earthworks that are less than 3,000m2 that are not otherwise permitted by WH.R23 and P.R22.	Retain rule R101 so that it continues to apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.		Reject
	Transpower New Zealand Limited	FS23.758	Forest & Bird	5.2 and 5.3 Discharges to land and water and land use rules	Rule R101: Earthworks – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										points and specific relief.	
	Transpower New Zealand Limited	FS33.006	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	5.2 and 5.3 Discharges to land and water and land use rules	Rule R101: Earthworks – permitted activity.		Support	Existing Rule R101 provides reasonable conditions for undertaking 'all other earthworks' that are less than 3,000m2 that are not otherwise permitted by WH.R23 and P.R22 and should continue to apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o Porirua Whaitua	Allow	Allow submission and make the changes sought.	Reject
	Transpower New Zealand Limited	FS47.144	Meridian Energy Limited	5.2 and 5.3 Discharges to land and water and land use rules	Rule R101: Earthworks – permitted activity.		Support	Meridian opposes aspects of the Whaitua-specific rules for earthworks management and, if Meridian's submission points are accepted, agrees Rule R101 should remain for all Whaitua;	Allow	Allow S177.015 and retain Rule R101 for all Whaitua.	Reject
	Transpower New Zealand Limited	FS31.003	Wellington International Airport Limited	5.2 and 5.3 Discharges to land and water and land use rules	Rule R101: Earthworks – permitted activity.		Support	WIAL supports the recommended relief and agrees that the operative rule provides reasonable conditions for undertaking all other earthworks that are less than 3,000m2 that are not otherwise permitted by WH.R23 and P.R22.	Allow	Retain rule R101 so that it continues to apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Reject
S177.025	Transpower New Zealand Limited (S177)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Amend		Considers word "risk" should be replaced with "adverse effects" in chapeau, on basis that resource management policies should seek to manage actual or potential adverse effects of an activity, rather than risks generally.Considers requirement to retain soil and sediment on site under clause (a) does not recognise that soil and sediment may need to be removed from site in a controlled manner. Considers clause (a) should be amended to seek uncontrolled loss of soil and sediment from site is minimised, rather than requiring all soil and sediment to be retained on site.Considers clause (b) be qualified with "where practicable" to recognise any limits placed on land disturbance are reasonable and proportionate, particularly in context of good management practices already required by clause (a).	Policy WH.P29: Management of earthworks  The risk adverse effects of sediment discharges from earthworks shall be managed by:  (a) requiring retention minimising the uncontrolled loss of soil and sediment on the land using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), for the duration of the land disturbance, and (b) limiting, where practicable, the amount of land disturbed at any time, and (c) designing and implementing earthworks with knowledge of the existing environmental site constraints, specific engineering requirements and implementation of controls to limit the discharge of sediment to receiving environments, and (d) requiring erosion and sediment control measures to be installed prior to, and during earthworks and ensuring those controls remain in place and are maintained until the land is stabilised against erosion.		Accept in part
	Transpower New Zealand Limited	FS23.768	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Transpower New Zealand Limited	FS28.117	Waka Kotahi NZ Transport Agency	8 Whaitua Te	Policy WH.P29: Management		Support	Changes propose include clarity of policy.	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Transpower New Zealand Limited	FS31.055	Wellington International Airport Limited	Whanganui-a-Tara 8 Whaitua Te Whanganui-a-Tara	of earthworks. Policy WH.P29: Management of earthworks.		Support in part	WIAL supports the focus of the policy onto effects (as per the RMA). In addition to the scenario used in WIAL's submission, WIAL also agrees that some sediment may need to be discharged to a cleanfill, therefore not retaining on site. WIAL also agrees that it is appropriate to qualify limb c to recognise that limits placed on land disturbance should be reasonable and proportionate, particularly where good management practices are already in place.	Allow in part	Amend Policy WH.P29 as follows: Management of earthworks The risk adverse effects of sediment discharges from earthworks shall be managed by: (a) requiring retention minimising the uncontrolled loss of soil and sediment on the land using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), for the duration of the land disturbance, and (b) limiting, where practicable, the amount of land disturbed at any time, and (c) ...	Accept in part
S177.026	Transpower New Zealand Limited (S177)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Support		Considers standards set out in the policy to be reasonable.	Retain as notified		Accept in part
	Transpower New Zealand Limited	FS23.769	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S177.027	Transpower New Zealand Limited (S177)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose		Considers a policy requiring all earthworks over 3,000m2 to be shut down over the winter months is inappropriate, as it does not recognise there may be circumstances where earthworks need to occur over those months in order to provide for safe and efficient operation, maintenance, upgrading, or development of regionally significant infrastructure. Considers there are instances where earthworks are unavoidable at this time, and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Notes GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), which is referred to in the policy, provides a pathway for earthworks to be undertaken during the winter months subject to careful management and considers	Delete policy.		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								pathway should continue to be available to applicants through consent process.			
	Transpower New Zealand Limited	FS23.770	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Transpower New Zealand Limited	FS47.183	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S177.027 by deleting Policy WH.P31.	Accept
S177.041	Transpower New Zealand Limited (S177)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		Notes effect of use of “and” at the end of condition (b) is to exclude all earthworks not related to implementing farm erosion risk treatment plans or farm environmental plans from the permitted activity rule. As a result, all other earthworks, regardless of size or whether they meet conditions (c) to (h) will be a restricted discretionary activity under rule WH.R24. Considers this is an error and acknowledges Council have corrected this under clause 16 of Schedule 1 to the RMA by way of a memo published on 6 December 2023. Submitter has submitted on the rule as notified. Notes Council's proposed approach is to remove associated discharges from earthworks rule, and instead, discharges associated with earthworks are permitted under separate “minor discharges” rule (R91). Given that rule WH.R23 is not a discharge rule, submitter considers it should not include condition (g), which is a discharge condition. Considers condition (g) inappropriate as it is not consistent with the minor discharges rule, which permits a minor discharge of suspended solids to surface water bodies or coastal water. Considers that given minor discharges rule provides for discharge of suspended solids, condition (h) be amended to reflect purpose of erosion and sediment control is to prevent uncontrolled discharge of sediment, rather than all discharge of sediment. Opposes rule being included within freshwater planning instrument, as purpose of rule is to manage land use for purposes of soil conservation. As rule does not provide for discharges associated with earthworks, there is no justification for including it in freshwater planning instrument, seeks that it be reallocated to Part 1 Schedule 1 planning instrument.	<p>Amend rule as follows:<p>Rule WH.R23: Earthworks<p>Earthworks is a permitted activity, provided the following conditions are met:<p>(a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or<p>(b) the earthworks are to implement an action in the farm environment plan for the farm, and or <p>(c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and<p>(d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and<p>(e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and<p>(f) the area of earthworks must be stabilised within six months after completion of the earthworks, and<p>(g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and <p>(h) erosion and sediment control measures shall be used to prevent a the uncontrolled discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.<p>Note<p>Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).<p>In addition to this, reallocate the rule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.		Reject
	Transpower New Zealand Limited	FS23.784	Forest & Bird	8 Whaitua Te	Rule WH.R23: Earthworks –		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent	Disallow	Oppose the whole of the submission and all relief sought unless	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				Whanganui-a-Tara	permitted activity.			with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).		otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	
	Transpower New Zealand Limited	FS28.118	Waka Kotahi NZ Transport Agency	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Changes reflect practical implementation of sediment control methodology.	Allow	Not stated	Reject
	Transpower New Zealand Limited	FS33.025	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Support the relief sought as an effective way of resolving the conflict between clause (g) and the 'minor discharges' rule R91.	Allow	Allow submission and make the changes sought.	Reject
	Transpower New Zealand Limited	FS47.255	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Meridian agrees that the chapeau of the rule needs to provide for associated discharges (including discharges of sediment and/or flocculant) and considers that clause (g) is unachievable and unreasonable;	Allow	Allow S177.041.	Accept
S177.042	Transpower New Zealand Limited (S177)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		Considers chapeau of rule be restructured to locate "associated discharge" element of rule to follow on from "Earthworks that do not comply with Rule WH.R23" as discharges associated with permitted earthworks are not provided for under rule WH.R23 (which only permits earthworks). Discharges from permitted earthworks are instead provided for under the "minor discharges" rule R91.Considers a condition requiring earthworks be shut down over the winter months is inappropriate, as it does not recognise circumstances where earthworks need to occur over those months in order to provide for safe and efficient operation, maintenance, upgrading, or development of regionally significant infrastructure (including the National Grid).Recognises earthworks should be planned so majority of bulk earthworks occur outside of winter months. Considers instances where earthworks are unavoidable and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff.Notes GWRC Erosion and Sediment Control Guideline for Wellington Region (2021), which is referred to in policy WH.P31 (and in the note to permitted activity rule WH.R23), provides a pathway for earthworks to be undertaken during winter months subject to careful management. Considers rather than a blanket restriction on all earthworks over this period, reference is made to matters set out under section G5.0 of guideline as a matter of discretion for earthworks. Considers this will ensure consistency between the rules and the Council's technical guidance for the management of earthworks, and provide for appropriate conditions to manage works over the winter period to be included in resource consents. Considers the note directing Plan users to GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021) that is included under permitted activity rule WH.R23 also be provided for under this rule.	<p>Amend rule as follows:<p>Rule WH.R24: Earthworks<p>Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23, and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, is a restricted discretionary activity, provided the following conditions are met:<p>(a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or<p>(ii) 30% in any other river, and<p>(b) earthworks shall not occur between 1st June and 30th September in any year. <p>Matters for discretion<p>1. The location, area, scale, volume, duration and staging and timing of works<p>2. The design and suitability of erosion of sediment control measures including consideration of hazard mitigation and the risk of accelerated soil erosion associated the staging of works and progressive stabilisation<p>3. The placement and treatment of stockpiled materials on the		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									<p>site, including requirements to remove material if it is not to be reused on the site&lt;p&gt;4. The proportion of unconsolidated land in the catchment&lt;p&gt;5. The adequacy and efficiency of stabilisation devices for sediment control&lt;p&gt;6. Any adverse effects on:&lt;p&gt;(i) groundwater, surface water bodies and their margins, particularly surface water bodies within sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori customary use) or Schedule I (important trout fishery rivers and spawning waters)&lt;p&gt;(ii) group drinking water supplies and community drinking water supplies&lt;p&gt;(iii) mauri, water quality (including water quality in the coastal marine area), aquatic and marine ecosystem health, aquatic and riparian habitat quality, indigenous biodiversity values, mahinga kai and critical life cycle periods for indigenous aquatic species&lt;p&gt;(iv) the natural character of lakes, rivers, natural wetlands and their margins and the coastal environment&lt;p&gt;(v) natural hazards, land stability, soil erosion, sedimentation and flood hazard management including the use of natural buffers&lt;p&gt;7. Duration of the consent&lt;p&gt;8. Preparation required for the close-down period (from 1st June to 30th September each year) and any maintenance activities required during this period Where earthworks will be undertaken within the period from 1 June to 30 September, the matters set out under section G5.0 of the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021) &lt;p&gt;9. Monitoring and reporting requirements&lt;p&gt;</p> <p>Note&lt;p&gt;Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).</p>		
	Transpower New Zealand Limited	FS23.785	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Transpower New Zealand Limited	FS33.026	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Support the relief sought as consequential to the changes sought by S177 to Rule WH.R23, which are supported, subject to the relief sought in relation to WH.R24 in the Fuel Companies own submission.	Allow	Allow submission and make the changes sought.	Reject
	Transpower New Zealand Limited	FS47.271	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Meridian agrees the rule should provide for associated discharges and agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S177.042.	Accept
	Transpower New Zealand Limited	FS31.085	Wellington International Airport Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support in part	WIAL supports the relief to the extent that it addresses the matters raised in WIAL's original submission	Allow in part	Amend rule as follows: Rule WH.R24: Earthworks Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23, and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, is a restricted discretionary activity, provided the following conditions are met: ... and(b) earthworks shall not occur between 1st June and 30th September in any year. Matters for discretion ... 8. Preparation required for the close-down period (from 1st June to 30th September each year) and any maintenance activities required during this period Where earthworks will be undertaken within the period from 1 June to 30 September, the matters set out under section G5.0 of the Greater Wellington Regional Greater Wellington Regional	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021) 9. Monitoring and reporting requirements Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).	
S177.043	Transpower New Zealand Limited (S177)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.	Amend		Considers that the move to non-complying activity status for all other earthworks is not clearly explained or justified in the section 32 evaluation report. Non-compliance with conditions under rule WH.R25 will trigger the non-complying activity rule. Non-complying activity status for minor breaches of rule conditions can be a particular issue for development or upgrading of the National Grid. This leads to a high degree of uncertainty as to whether consents for development or upgrading of the National Grid will be granted under section 104D of RMA, even where adverse effects of the part of the proposal that triggered non-complying activity status can be appropriately addressed through consent conditions. This does not appropriately give effect to policy 2 of NPSET, as it does not provide for the effective upgrading and development of the electricity transmission network. Considers the non-complying activity rule is not sufficiently justified in section 32 report and does not appropriately provide for activities that do not meet restricted discretionary activity conditions, but which can otherwise be managed through consent conditions as a discretionary activity.	Amend rule as follows:  Rule WH.R25: Earthworks – non-complying discretionary activity  Earthworks, and the associated discharge of sediment into a surface water body or coastal water or onto or into land where it may enter a surface water body or coastal water from earthworks, including via a stormwater network, that does not comply with Rule WH.R24 is a non-complying discretionary activity.		Accept
	Transpower New Zealand Limited	FS23.786	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Transpower New Zealand Limited	FS33.027	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Support	Consider a discretionary, rather than non-complying, activity status is appropriate in the event the standards in WH.R24 cannot be met, and there is insufficient evidence to justify a non-complying status.	Allow	Allow submission and make the changes sought.	Accept
	Transpower New Zealand Limited	FS47.295	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Support in part	Meridian agrees non-complying activity status is inappropriate for the scope of breaches contemplated by the rule, for the National Grid and for all regionally significant infrastructure (including renewable electricity generation);	Allow in part	Allow S177.043 in part by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										compliance with conditions.	
S177.051	Transpower New Zealand Limited (S177)			9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Amend		Considers word “risk” should be replaced with “adverse effects” in chapeau, on basis that resource management policies should seek to manage actual or potential adverse effects of an activity, rather than risks generally. Considers requirement to retain soil and sediment on site under clause (a) does not recognise that soil and sediment may need to be removed from site in a controlled manner as part of works associated with maintenance, upgrading, or development of regionally significant infrastructure (including the National Grid). Considers clause (a) should be amended to seek uncontrolled loss of soil and sediment from site is minimised, rather than requiring all soil and sediment to be retained on site. Considers clause (b) be qualified with “where practicable” to recognise any limits placed on land disturbance are reasonable and proportionate, particularly in context of good management practices already required by clause (a).	Policy P.P27: Management of earthworks sites  The risk adverse effects of sediment discharges from earthworks shall be managed by:  (a) requiring retention minimising the uncontrolled loss of soil and sediment on the site using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021), for the duration of the land disturbance, and (b) limiting, where practicable, the amount of land disturbed at any time, and (c) designing and implementing earthworks with knowledge of the existing environmental site constraints, specific engineering requirements and implementation of controls to limit the discharge of sediment to receiving environments, and (d) requiring erosion and sediment control measures to be installed prior to, and during earthworks and ensuring those controls remain in place and are maintained until the land is stabilised against erosion.		Accept
	Transpower New Zealand Limited	FS23.794	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird’s submission points and specific relief.	Reject
	Transpower New Zealand Limited	FS28.120	Waka Kotahi NZ Transport Agency	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.		Support	Changes proposed include clarity of policy.	Allow	Not stated	Accept
	Transpower New Zealand Limited	FS47.318	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.		Support	Meridian agrees that complete retention of soil and sediment on site is not practicable in all situations, including where soil and sediment need to be removed from site in a controlled manner;	Allow	Allow S177.051.	Accept
S177.052	Transpower New Zealand Limited (S177)			9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Support		Considers standards set out in the policy to be reasonable.	Retain as notified		Accept in part
	Transpower New Zealand Limited	FS23.795	Forest & Bird	9 Te Awarua-o-	Policy P.P28:		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of	Disallow	Oppose the whole of the submission and all	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				Porirua Whaitua	Discharge standard for earthworks sites.			waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).		relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	
S177.053	Transpower New Zealand Limited (S177)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose		Considers a policy requiring all earthworks over 3,000m2 to be shut down over the winter months is inappropriate, as it does not recognise there may be circumstances where earthworks need to occur over those months in order to provide for safe and efficient operation, maintenance, upgrading, or development of regionally significant infrastructure. Considers there are instances where earthworks are unavoidable at this time, and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Notes GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), which is referred to in the policy, provides a pathway for earthworks to be undertaken during the winter months subject to careful management and considers pathway should continue to be available to applicants through consent process.	Delete policy.		Accept
	Transpower New Zealand Limited	FS16.172	Woodridge Holdings Ltd	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Not stated	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. 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.	Allow	Delete policy and make earthworks greater than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	Transpower New Zealand Limited	FS23.796	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Transpower New Zealand Limited	FS47.331	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S177.053.	Accept
S177.067	Transpower New Zealand Limited (S177)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Amend		Notes effect of use of “and” at the end of condition (b) is to exclude all earthworks not related to implementing farm erosion risk treatment plans or farm environmental plans from the permitted activity rule. As a result, all other earthworks, regardless of size or whether they meet conditions (c) to (h) will be a restricted discretionary activity under rule P.R23. Considers this is an error and acknowledges Council have corrected this under clause 16 of Schedule 1 to the RMA by way of a memo published on 6 December 2023. Submitter has submitted on the rule as notified. Notes Council's proposed approach is to remove associated discharges from earthworks rule, and instead, discharges associated with earthworks are permitted under separate “minor discharges” rule (R91). Given that rule P.R22 is not a discharge rule, submitter considers it should not include condition (g), which is a discharge condition. Considers condition	<p>Amend rule as follows:<p>Rule P.R22: Earthworks <p>Earthworks is a permitted activity, provided the following conditions are met:<p>(a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or<p>(b) the earthworks are to implement an action in the farm environment plan for the farm, and or<p>(c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and<p>(d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and<p>(e) soil		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								(g) inappropriate as it is not consistent with the minor discharges rule, which permits a minor discharge of suspended solids to surface water bodies or coastal water. Considers that given minor discharges rule provides for discharge of suspended solids, condition (h) be amended to reflect purpose of erosion and sediment control is to prevent uncontrolled discharge of sediment, rather than all discharge of sediment. Opposes rule being included within freshwater planning instrument, as purpose of rule is to manage land use for purposes of soil conservation. As rule does not provide for discharges associated with earthworks, there is no justification for including it in freshwater planning instrument, seeks that it be reallocated to Part 1 Schedule 1 planning instrument.	or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a the uncontrolled discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. <p>Note<p>Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).<p><p>In addition to this, reallocate the rule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.		
	Transpower New Zealand Limited	FS23.810	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
	Transpower New Zealand Limited	FS33.042	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Support the relief sought as an effective way of resolving the conflict between clause (g) and the 'minor discharges' rule R91.	Allow	Allow submission and make the changes sought.	Reject
	Transpower New Zealand Limited	FS47.393	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Meridian agrees that clause (g) is unachievable and unreasonable and also considers that the chapeau of the rule needs to provide for associated discharges (including discharges of sediment and/or flocculant);	Allow	Allow S177.067 by deleting (g) and by providing for associated discharges in the chapeau to the rule.	Accept in part
S177.068	Transpower New Zealand Limited (S177)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Amend		Considers chapeau of rule be restructured to locate "associated discharge" element of rule to follow on from "Earthworks that do not comply with Rule P.R22" as discharges associated with permitted earthworks are not provided for under rule P.R22 (which only permits earthworks). Discharges from permitted earthworks are instead provided for under the "minor discharges" rule R91. Considers a condition requiring earthworks be shut down over the winter months is inappropriate, as it does not recognise circumstances where earthworks need to occur over those months in order to provide for safe and efficient operation, maintenance, upgrading, or development of regionally significant infrastructure (including the National Grid). Recognises earthworks should be planned so majority of bulk earthworks occur outside of winter months. Considers instances where earthworks are	<p>Rule P.R23: Earthworks<p>Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule P.R22, and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, is a restricted discretionary activity, provided the following conditions are met:<p>(a) the		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								unavoidable and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Notes GWRC Erosion and Sediment Control Guideline for Wellington Region (2021), which is referred to in policy P.P29 (and in the note to permitted activity rule P.R22), provides a pathway for earthworks to be undertaken during winter months subject to careful management. Considers rather than a blanket restriction on all earthworks over this period, reference is made to matters set out under section G5.0 of guideline as a matter of discretion for earthworks. Considers that the note directing Plan users to GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021) that is included under permitted activity rule P.R22 also be provided for under this rule.	concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year. Matters for discretion 1. The location, area, scale, volume, duration and staging and timing of works 2. The design and suitability of erosion of sediment control measures including consideration of hazard mitigation and the risk of accelerated soil erosion associated the staging of works and progressive stabilisation 3. The placement and treatment of stockpiled materials on the site, including requirements to remove material if it is not to be reused on the site 4. The proportion of unstabilised land in the catchment 5. The adequacy and efficiency of stabilisation devices for sediment control 6. Any adverse effects on: (i) groundwater, surface water bodies and their margins, particularly surface water bodies within sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori customary use) or Schedule I (important trout fishery rivers and spawning waters) (ii) group drinking water supplies and community drinking water supplies (iii) mauri, water quality (including water quality in the coastal marine area), aquatic and marine ecosystem health, aquatic and riparian habitat quality, indigenous biodiversity values, mahinga kai and critical life cycle periods for indigenous aquatic species (iv) the natural character of lakes, rivers, natural wetlands and their margins and the coastal environment (v) natural hazards, land stability, soil erosion, sedimentation and flood hazard management including the use of natural buffers 7. Duration of the consent 8. Preparation required for the close-down period (from 1st June to 30th September each year) and any maintenance activities required during		

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									this period Where earthworks will be undertaken within the period from 1 June to 30 September, the matters set out under section G5.0 of the Greater Wellington Regional Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021) <p>9. Monitoring and reporting requirements<p>Note<p>Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).		
	Transpower New Zealand Limited	FS23.811	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
	Transpower New Zealand Limited	FS33.043	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Support the relief sought as consequential to the changes sought by S177 to Rule P.R22, which are supported, subject to the relief sought in relation to P.R23 in the Fuel Companies own submission.	Allow	Allow submission and make the changes sought.	Accept in part
	Transpower New Zealand Limited	FS47.411	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Meridian agrees the rule should provide for associated discharges and agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S177.068.	Accept in part
S177.069	Transpower New Zealand Limited (S177)			9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.	Amend		Considers that the move to non-complying activity status for all other earthworks is not clearly explained or justified in the section 32 evaluation report. Non-compliance with conditions under rule P.R24 will trigger the non-complying activity rule. Non-complying activity status for minor breaches of rule conditions can be a particular issue for development or upgrading of the National Grid, which due to the linear nature of the Grid can involve complex, bundled consents for a broad range of activities, some of which may have adverse effects that are more than minor (for example, visual effects). This leads to a high degree of uncertainty as to whether consents for development or upgrading of the National Grid will be granted under section 104D of RMA, even where adverse effects of the part of the proposal that triggered non-complying activity status can be appropriately addressed through consent conditions. This does not appropriately give effect to policy 2 of NPSET, as it does not provide for the effective upgrading and development of the electricity transmission network. Considers the non-complying activity rule is not sufficiently justified in section 32 report and does not appropriately provide for activities that do not meet restricted discretionary activity conditions, but which can otherwise be managed through consent conditions as a discretionary activity.	Amend rule as follows:  Rule P.R24: Earthworks – non-complying discretionary activity  Earthworks, and the associated discharge of sediment into a surface water body or coastal water or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule P.R23 is a non-complying discretionary activity.		Accept
	Transpower New Zealand Limited	FS23.812	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					complying activity.			with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).		where points are consistent with Forest & Bird's submission points and specific relief.	
	Transpower New Zealand Limited	FS33.044	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Support	Consider a discretionary, rather than non-complying, activity status is appropriate in the event the standards in P.R23 cannot be met, and there is insufficient evidence to justify a non-complying status.	Allow	Allow submission and make the changes sought.	Accept
	Transpower New Zealand Limited	FS47.432	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Support in part	Meridian agrees the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;	Allow in part	Allow S177.069 in part by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.	Accept
S18.002	PF Olsen Ltd (S18)			2 Interpretation	Earthworks	Amend		Concerned with having different definitions for earthworks and seeks consistency within legislation. Seeks clarification on if earthworks rules apply for forestry earthworks outside of Rules WR.20, WR.21, WH.R22, P.R19, P.R20 and P.R21.	Amend the definition of Earthworks to provide consistency.  Exclude forestry earthworks from earthworks rules.		Accept
	PF Olsen Ltd	FS25.057	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	2 Interpretation	Earthworks		Support in part	Request is consistent with GTC submission that seeks the NRP to rely on the requirements of the NES-CF to address water quality affects associated with commercial forestry which are considered appropriate; more rigorous requirements in the NRP are not considered necessary to implement the NPS-FM or to achieve the purpose of the RMA	Allow in part	Exclude forestry from earthworks rules	Accept
	PF Olsen Ltd	FS50.123	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	Earthworks		Support	NZCF supports the submission to the extent that NZCF considers that the definition should be clear in its meaning and application including in respect of the rules that apply to commercial forestry.	Allow	Not stated	Accept
S18.009	PF Olsen Ltd (S18)			2 Interpretation	Stabilisation	Amend		Seeks consistency across the plan. Seeks clarification on if the definition applies for forestry earthworks.	Amend to clarify definition across the entire plan. Exclude earthworks for forestry from this definition.  For plantation forestry, default to the NES-CF.		Accept
S18.029	PF Olsen Ltd (S18)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Amend		Seeks clarification on if the policy applies for forestry earthworks. Considers that forestry earthworks should be managed under the NES-CF by default.	Clarify if the policy applies to forestry earthworks.		Accept
S18.030	PF Olsen Ltd (S18)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Amend		Seeks clarification on if discharge standards for earthworks apply to forestry earthworks. Considers that additional restrictions are unnecessary in light of the NES-CF, unless evaluated under s32(4) of the RMA.	Clarify if the policy applies to forestry earthworks.		Accept
S18.031	PF Olsen Ltd (S18)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose		Considers that the proposed winter shutdown for earthworks will have significant economic burdens for construction projects. Seeks for an economic impact assessment to be undertaken. Seeks for alternative mitigation measures to be implemented for essential earthworks, rather than a blanket prohibition. Seeks flexibility to allow for case-by-case evaluations based on project-specific circumstances. Seeks alignment with national standards, to balance environmental protection with the facilitation of essential construction activities.	Delete provision		Accept



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	PF Olsen Ltd	FS47.175	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S18.031 by deleting Policy WH.P31.	Accept
S18.037	PF Olsen Ltd (S18)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		Seeks clarification on if the rule applies to forestry earthworks.	Amend to default to NES-CF concerning forestry earthworks.		Reject
	PF Olsen Ltd	FS25.060	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Request is consistent with GTC submission that seeks the NRP to rely on the requirements of the NES-CF to address water quality affects associated with commercial forestry which are considered appropriate; more rigorous requirements in the NRP are not considered necessary to implement the NPS-FM or to achieve the purpose of the RMA	Allow	Amend Rule WH.R23 to default to the NES-CF standards for earthworks associated with commercial forestry	Reject
S18.038	PF Olsen Ltd (S18)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		Seeks clarification on if the rule applies to forestry earthworks.	Amend to default to NES-CF concerning forestry earthworks.		Reject
S18.039	PF Olsen Ltd (S18)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.	Amend		Seeks clarification on if the rule applies to forestry earthworks.	Amend to default to NES-CF concerning forestry earthworks.		Reject
S18.055	PF Olsen Ltd (S18)			9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Amend		Seeks clarification on if the policy applies for forestry earthworks. Considers that the policy should not apply to forestry earthworks as it is already managed under the NES-CF.	State that the policy does not apply to forestry earthworks.		Accept
S18.056	PF Olsen Ltd (S18)			9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Amend		Seeks clarification on if the policy applies for forestry earthworks. Considers that the policy should not apply to forestry earthworks as it is already managed under the NES-CF.	State that the policy does not apply to forestry earthworks.		Accept
S18.057	PF Olsen Ltd (S18)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose		Considers the proposed winter shutdown for earthworks will have significant economic burdens for construction projects. Seeks for an economic impact assessment to be undertaken. Seeks for alternative mitigation measures to be implemented for essential earthworks, rather than a blanket prohibition.	Delete this policy		Accept
	PF Olsen Ltd	FS47.322	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S18.057.	Accept
S18.064	PF Olsen Ltd (S18)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Amend		Seeks clarification on if the rule applies to forestry earthworks.	Amend to clarify if the permitted activity requirement applies to forestry earthworks.		Reject
S18.065	PF Olsen Ltd (S18)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Amend		Seeks clarification on if the rule applies to forestry earthworks.	Amend to clarify if restricted discretionary activity will apply to forestry earthworks.		Reject
S18.066	PF Olsen Ltd (S18)			9 Te Awarua-o-	Rule P.R24: Earthworks – non-	Amend		Seeks clarification on if the rule applies to forestry earthworks.	Amend to clarify if restricted discretionary activity will apply to forestry earthworks.		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				Porirua Whaitua	complying activity.						
S183.013	Yvonne Weeber (S183)			2 Interpretation	Earthworks	Support		Not stated	Not stated		Accept
	Yvonne Weeber	FS27.013	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	Earthworks		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part
S183.042	Yvonne Weeber (S183)			2 Interpretation	Stabilisation	Support		Not stated	Not stated		Accept
	Yvonne Weeber	FS27.042	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	Stabilisation		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is	Allow	Not stated	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.147	Yvonne Weeber (S183)			5.2 and 5.3 Discharges to land and water and land use rules	Rule R101: Earthworks – permitted activity.	Neutral		Not stated	Not stated		Accept
	Yvonne Weeber	FS27.147	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	5.2 and 5.3 Discharges to land and water and land use rules	Rule R101: Earthworks – permitted activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept
S183.148	Yvonne Weeber (S183)			5.2 and 5.3 Discharges to land and	Rule R102: Construction of a new	Neutral		Not stated	Not stated		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				water and land use rules	farm track – permitted activity.						
	Yvonne Weeber	FS27.148	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	5.2 and 5.3 Discharges to land and water and land use rules	Rule R102: Construction of a new farm track – permitted activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept
S183.149	Yvonne Weeber (S183)			5.2 and 5.3 Discharges to land and water and land use rules	Rule R103: Construction of a new farm track – controlled activity.	Neutral		Not stated	Not stated		Accept
	Yvonne Weeber	FS27.149	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	5.2 and 5.3 Discharges to land and water and land use rules	Rule R103: Construction of a new farm track – controlled activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that	Allow	Not stated	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								“planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.219	Yvonne Weeber (S183)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Support		Not stated	Not stated		Accept in part
	Yvonne Weeber	FS27.219	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S183.220	Yvonne Weeber (S183)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Support		Not stated	Not stated		Accept in part
	Yvonne Weeber	FS27.220	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part
S183.221	Yvonne Weeber (S183)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Support		Not stated	Not stated		Reject
	Yvonne Weeber	FS27.221	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.246	Yvonne Weeber (S183)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Neutral		Not stated	Not stated		Accept
	Yvonne Weeber	FS27.246	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept

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S183.247	Yvonne Weeber (S183)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Neutral		Not stated	Not stated		Accept
	Yvonne Weeber	FS27.247	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept
S183.248	Yvonne Weeber (S183)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.	Neutral		Not stated	Not stated		Accept
	Yvonne Weeber	FS27.248	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is	Allow	Not stated	Accept



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.302	Yvonne Weeber (S183)			9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Support		Not stated	Not stated		Accept in part
	Yvonne Weeber	FS27.302	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								discharges to water from activities on this site, is appropriate.			
S183.303	Yvonne Weeber (S183)			9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Support		Not stated	Not stated		Accept in part
	Yvonne Weeber	FS27.303	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part
S183.304	Yvonne Weeber (S183)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Support		Not stated	Not stated		Reject
	Yvonne Weeber	FS27.304	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S183.328	Yvonne Weeber (S183)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Support		Not stated	Not stated		Accept in part
	Yvonne Weeber	FS27.328	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								discharges to water from activities on this site, is appropriate.			
S183.329	Yvonne Weeber (S183)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Support		Not stated	Not stated		Accept in part
	Yvonne Weeber	FS27.329	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part
S183.330	Yvonne Weeber (S183)			9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.	Support		Not stated	Not stated		Reject
	Yvonne Weeber	FS27.330	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S186.008	Guardians of the Bays Inc (S186)			2 Interpretation	Earthworks	Support		Not stated	Not stated		Accept
	Guardians of the Bays Inc	FS27.431	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	2 Interpretation	Earthworks		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S186.137	Guardians of the Bays Inc (S186)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Neutral		Not stated	Not stated		Accept
	Guardians of the Bays Inc	FS27.560	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept
S186.138	Guardians of the Bays Inc (S186)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Neutral		Not stated	Not stated		Accept
	Guardians of the Bays Inc	FS27.561	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being	Allow	Not stated	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S186.139	Guardians of the Bays Inc (S186)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.	Neutral		Not stated	Not stated		Accept
	Guardians of the Bays Inc	FS27.562	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or	Allow	Not stated	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								discharges to water from activities on this site, is appropriate.			
S188.064	Wellington Fish and Game Regional Council (S188)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Not Stated		Considers if Erosion and Sediment Control Guideline (2021) was sufficient, there would be no sediment in waterways from earthworks. Notes earthworks still currently noted to cause sediment inputs into waterways around region, so increased measures to control inputs are required.	Seeks increased measures to control sediment inputs into waterways.		Reject
	Wellington Fish and Game Regional Council	FS9.064	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Oppose	Not stated	Disallow	Not stated	Accept
	Wellington Fish and Game Regional Council	FS21.069	Manor Park Golf Club (Incorporated) (MPGC)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Support	In keeping with the sanctuary environment status that the MPGC has established and is looking to maintain.	Allow	Not stated	Reject
	Wellington Fish and Game Regional Council	FS23.1220	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought be unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
	Wellington Fish and Game Regional Council	FS27.1153	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part



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	Wellington Fish and Game Regional Council	FS28.062	Waka Kotahi NZ Transport Agency	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Oppose	Relief lacks specificity to assess impact.	Disallow	Not stated	Reject
	Wellington Fish and Game Regional Council	FS45.072	Kāinga Ora – Homes and Communities	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Oppose	Kāinga Ora consider the Erosion and Sediment Control Guideline (2021) sufficient in managing sediment and erosion control. Any changes to this need to be adequately consulted on.	Disallow	Considers if Erosion and Sediment Control Guideline (2021) was sufficient, there would be no sediment in waterways from earthworks. Notes earthworks still currently noted to cause sediment inputs into waterways around region, so increased measures to control inputs are required.	Accept
S188.065	Wellington Fish and Game Regional Council (S188)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Not Stated		Considers if the Erosion and Sediment Control Guideline (2021) was sufficient, there would be no sediment in waterways from earthworks. Notes earthworks still currently noted to cause sediment inputs into waterways around region, so increased measures to control inputs are required. Supports policy discussing visual monitoring. Considers clause (a) locks in ability to keep pumping sediment into already sediment laden rivers which will not allow for improvement in degraded waterways and does not align with Te Mana o te Wai, RMA (1991), the NPS-FM (2020). Considers action suggested in clause c), if visual clarity triggers be reached, reports results to GWRC, rather than practical methodologies such as halting work and allowing waterway time to clear. Reports, while valuable for preventing further incidents, do little to protect waterways from immediate harm from earthworks.	Not stated		Reject
	Wellington Fish and Game Regional Council	FS9.065	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Oppose	Not stated	Disallow	Not stated	Accept
	Wellington Fish and Game Regional Council	FS21.070	Manor Park Golf Club (Incorporated) (MPGC)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Support	In keeping with the sanctuary environment status that the MPGC has established and is looking to maintain.	Allow	Not stated	Reject
	Wellington Fish and Game Regional Council	FS23.1221	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought be unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
	Wellington Fish and Game Regional Council	FS27.1154	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
	Wellington Fish and Game Regional Council	FS45.073	Kāinga Ora – Homes and Communities	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Oppose	Kāinga Ora consider the Erosion and Sediment Control Guideline (2021) sufficient in managing sediment and erosion control. Any changes to this need to be adequately consulted on.	Disallow	Considers if Erosion and Sediment Control Guideline (2021) was sufficient, there would be no sediment in waterways from earthworks. Notes earthworks still currently noted to cause sediment inputs into waterways around region, so increased measures to control inputs are required.	Accept
S188.066	Wellington Fish and Game Regional Council (S188)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Support		Not stated	Not stated		Reject
	Wellington Fish and Game Regional Council	FS9.066	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Oppose	Not stated	Disallow	Not stated	Accept
	Wellington Fish and Game Regional Council	FS21.071	Manor Park Golf Club (Incorporated) (MPGC)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	In keeping with the sanctuary environment status that the MPGC has established and is looking to maintain.	Allow	Not stated	Reject
	Wellington Fish and Game Regional Council	FS23.1222	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought be unless otherwise stated or where points are inconsistent with Forest & Bird’s submission	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Wellington Fish and Game Regional Council	FS27.1155	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	points and specific relief. Not stated	Reject
S190.001	David McKevitt (S190)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Amend		Considers the proposed TSS limit of 100g/m3 is not based on scientific evidence, and is a significant reduction from the existing threshold of 170 NTU. Concerned technical publications for PC1 do not refer to the TSS standard of 100g/m3 and questions how this standard was decided and whether it is scientifically linked to the target attribute states. States GWRC and the earthworks industry have largely moved from TSS for compliance measurements to NTU. Considers NTU is a more effective and quicker measurement for compliance than TSS. Questions why it is deemed acceptable that the upstream and down stream comparison when TSS exceeds 100g/m3 can be made using visual clarity (aka turbidity in NTU), when the preceding measurements in the policy are prescribed in TSS.	Re-evaluate and re-draft proposed TSS limit.  Provide for proxy field measurements as a substitute for TSS, such as NTU.		Accept in part
	David McKevitt	FS34.044	Orogen Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Support	See Orogen submission points S239.010 & S239.018	Allow	Adopt submission	Accept in part
S190.002	David McKevitt (S190)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut	Amend		Supports the management of increased risk during high rainfall, however considers that the length of the proposed winter period is too onerous for the number of activities that require earthworks, particularly given	Earthworks over 3,000m2 in area shall:  (a) be shut down limited from 1st June		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					down of earthworks.			that the definition of earthworks includes a broader range of activities. Notes earthworks are currently successfully completed during the winter works period with appropriate management of risk from increased rainfall, with the relevant risk factors taken into account by GWRC for each site. Considers blanket activity status for all winter earthworks removes the ability for GWRC to consider factors such as the compliance history of a consent holder, and consent holders with inadequate performance could be more likely to be authorised to undertake winter works than under the current regime. Notes under the operative definition of earthworks, lower risk activities could be completed during the winter works period, such as trenching for infrastructure and services. Concerned such activities will require resource consent, therefore being onerous on contractors and lengthening project durations, without achieving an appropriate reduction in environmental risk.	to 30th September each year, with a risk-based approach taken to the permitting of earthworks activities during this period, and  (b) prior to shut down 1st June, areas to be shut down shall be stabilised against erosion and have sediment controls in place using good management practices in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).		
	David McKevitt	FS25.098	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Oppose	The additional provisions sought to Policy WH.P31 regarding the winter shut down period are unnecessary and impracticable and do not represent good planning practice, and would not implement the NPS-FM or achieve the purpose of the RMA	Disallow	Delete Policy WH.P31 in its entirety, as sought by GTC in their submission	Accept
	David McKevitt	FS34.046	Orogen Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Refer to Orogen submission S239.004, S239.011, S239.012 & S239.019. A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approach to earthworks provides a better outcome for industry and compliance.	Allow	Adopt submission to amend rules.	Accept
S190.003	David McKevitt (S190)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		States the discharge of sediment from earthworks is unavoidable even with the use of sediment controls. Cites the technical reports for PC1, which reference studies specifying that the sediment removal of all devices are less than 100%, and that sediment discharge occurs even when the earthworks catchment is stabilised. Concerned the rule is unachievable and all earthworks, regardless of size and treatment, will require resource consent. States lower rates of sediment discharge continue to occur even from areas stabilised permanently with grass cover.	(iv) There is no discharge of runoff sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, that is not treated by erosion and sediment control measures, and  (v) Erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.		Accept in part
	David McKevitt	FS47.256	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support in part	Meridian agrees that clause (g) is impractical, unachievable and unreasonable and should be deleted;	Allow in part	Allow S190.003 by deleting clause (g).	Accept
S190.004	David McKevitt (S190)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		Considers the proposed TSS limit of 100g/m3 is not based on scientific evidence, and is a significant reduction from the existing threshold of 170 NTU. Concerned technical publications for PC1 do not refer to the TSS standard of 100g/m3 and questions how this standard was decided and whether it is scientifically linked to the target attribute states. States that GWRC and the earthworks industry have largely moved from TSS for compliance	(a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								<p>measurements to NTU. Considers that NTU is a more effective and quicker measurement for compliance than TSS. Questions why it is deemed acceptable that the upstream and down stream comparison when TSS exceeds 100g/m3 can be made using visual clarity (aka turbidity in NTU), when the preceding measurements in the policy are prescribed in TSS. Supports the management of increased risk during high rainfall, however considers that the length of the proposed winter period is too onerous for the number of activities that require earthworks, particularly given that the definition of earthworks includes a broader range of activities. Notes earthworks are currently successfully completed during the winter works period with appropriate management of risk from increased rainfall, with the relevant risk factors taken into account by GWRC for each site. Considers a blanket activity status for all winter earthworks removes the ability for GWRC to consider factors such as the compliance history of a consent holder, and consent holders with inadequate performance could be more likely to be authorised to undertake winter works than under the current regime. Notes under the operative definition of earthworks, lower risk activities could be completed during the winter works period, such as trenching for infrastructure and services. Concerned such activities will require resource consent, therefore being onerous on contractors and lengthening project durations, without achieving an appropriate reduction in environmental risk.</p>	<p>mixing, decrease the visual clarity in the receiving water by more than:</p> <p>(i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or</p> <p>(ii) 30% in any other river, and</p> <p>The proposed total suspended solids limit is re-evaluated and re-drafted. Provision is made for proxy field measurements, such as NTU (nephelometric turbidity units), can be utilised to substitute for total suspended solids</p> <p>(b) earthworks shall not occur between 1st June and 30th September in any year.</p> <p>The submitter requests that earthworks activities during the winter period is inserted as a matter of discretion under this rule:</p> <p>(a) Earthworks over 3000m2 shall be limited from 1st June to 30th September each year, with a risk-based approach taken to the permitting of earthworks activities during this period, and</p> <p>(b) prior to 1st June, areas to be shut down shall be stabilised against erosion and have sediment controls in place using good management practices in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).</p>		
	David McKevitt	FS25.099	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	The additional provisions sought to Clause (b) regarding the winter shut down period are unnecessary and impracticable and do not represent good planning practice, and would not implement the NPS-FM or achieve the purpose of the RMA	Disallow	Delete clause (b) from Rule WH.R24 regarding the earthworks winter shut down period	Reject
	David McKevitt	FS34.048	Orogen Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	See Orogen submission S239.010, S239.011, S239.018 & S230.019	Allow	Adopt submission to enable NTU measurements and undertake risk-based approach to winter works.	Accept in part
	David McKevitt	FS47.272	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support in part	Meridian agrees clause (b) is unreasonable and unnecessary;	Allow in part	Allow S190.004 by deleting clause (b) and related discretionary matter (8).	Reject
S190.005	David McKevitt (S190)			9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for	Amend		Considers the proposed TSS limit of 100g/m3 is not based on scientific evidence, and is a significant reduction from the existing threshold of 170 NTU. Concerned technical publications for PC1 do not	Re-evaluate and re-draft proposed TSS limit.		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					earthworks sites.			refer to the TSS standard of 100g/m3 and questions how this standard was decided and whether it is scientifically linked to the target attribute states. States that GWRC and the earthworks industry have largely moved from TSS for compliance measurements to NTU. Considers that NTU is a more effective and quicker measurement for compliance than TSS. Questions why it is deemed acceptable that the upstream and down stream comparison when TSS exceeds 100g/m3 can be made using visual clarity (aka turbidity in NTU), when the preceding measurements in the policy are prescribed in TSS.	Provide for proxy field measurements as a substitute for TSS, such as NTU.		
	David McKevitt	FS34.045	Orogen Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.		Support	See Orogen submission points S239.010 & S239.018	Allow	Adopt submission	Accept in part
S190.006	David McKevitt (S190)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Amend		Supports the management of increased risk during high rainfall, however considers that the length of the proposed winter period is too onerous for the number of activities that require earthworks, particularly given that the definition of earthworks includes a broader range of activities. Notes that currently, earthworks are successfully completed during the winter works period with appropriate management of risk from increased rainfall, with the relevant risk factors taken into account by GWRC for each site. Considers a blanket activity status for all winter earthworks removes the ability for GWRC to consider factors such as the compliance history of a consent holder, and that consent holders with inadequate performance could be more likely to be authorised to undertake winter works than under the current winter works application regime. Noted under the operative definition of earthworks, that lower risk activities could be completed during the winter works period, such as trenching for infrastructure and services. Expressed concern that such activities will require resource consent, therefore being onerous on contractors and lengthen project durations, without achieving an appropriate reduction in environmental risk.	Earthworks over 3,000m2 in area shall:  (a) be shut down limited from 1st June to 30th September each year, with a risk-based approach taken to the permitting of earthworks activities during this period, and  (b) prior to shut down 1st June, areas to be shut down shall be stabilised against erosion and have sediment controls in place using good management practices in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).		Accept
	David McKevitt	FS34.047	Orogen Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Refer to Orogen submission S239.004, S239.011, S239.012 & S239.019. A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approach to earthworks provides a better outcome for industry and compliance.	Allow	Adopt submission to amend rules.	Accept
	David McKevitt	FS47.332	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Oppose	Meridian considers that the risk-based approach can be achieved through conditions of consent directed by other policies;	Disallow	Allow S190.006 by deleting Policy P.P29.	Accept
S190.007	David McKevitt (S190)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Amend		States the discharge of sediment from earthworks is unavoidable even with the use of sediment controls. Cites the technical reports for PC1, which reference studies specifying that the sediment removal of all devices are less than 100%, and that sediment discharge occurs even the earthworks catchment is stabilised. Therefore, the submitter's interpretation of the rule is that all earthworks, regardless of size and treatment, will not comply and will therefore require resource consent. States that lower rates of sediment discharge continue to occur even from areas stabilised permanently with grass cover. States all of the sediment controls under Section F1.0 of GWRC's	(iv) There is no discharge of runoff sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, that is not treated by erosion and sediment control measures, and  (v) Erosion and sediment control measures shall be used to prevent a discharge of sediment where a		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021) have a sediment removal efficiency of less than 100%, citing the technical reports referenced in PC1.	preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.		
	David McKevitt	FS47.394	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support in part	Meridian agrees that clause (g) is impractical, unachievable and unreasonable and should be deleted;	Allow in part	Allow S190.007 by deleting clause (g).	Reject
S190.008	David McKevitt (S190)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Amend		Considers the proposed TSS limit of 100g/m3 is not based on scientific evidence, and is a significant reduction from the existing threshold of 170 NTU. Concerned technical publications for PC1 do not refer to the TSS standard of 100g/m3 and questions how this standard was decided and whether it is scientifically linked to the target attribute states. States that GWRC and the earthworks industry have largely moved from TSS for compliance measurements to NTU. Considers that NTU is a more effective and quicker measurement for compliance than TSS. Questions why it is deemed acceptable that the upstream and down stream comparison when TSS exceeds 100g/m3 can be made using visual clarity (aka turbidity in NTU), when the preceding measurements in the policy are prescribed in TSS. Supports the management of increased risk during high rainfall, however considers that the length of the proposed winter period is too onerous for the number of activities that require earthworks, particularly given that the definition of earthworks includes a broader range of activities. Notes earthworks are currently successfully completed during the winter works period with appropriate management of risk from increased rainfall, with the relevant risk factors taken into account by GWRC for each site. Considers a blanket activity status for all winter earthworks removes the ability for GWRC to consider factors such as the compliance history of a consent holder, and consent holders with inadequate performance could be more likely to be authorised to undertake winter works than under the current regime. Notes under the operative definition of earthworks, lower risk activities could be completed during the winter works period, such as trenching for infrastructure and services. Concerned such activities will require resource consent, therefore being onerous on contractors and lengthening project durations, without achieving an appropriate reduction in environmental risk.	<p>(a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than:</p> <p>(i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or</p> <p>(ii) 30% in any other river, and</p> <p>The proposed total suspended solids limit is re-evaluated and re-drafted.</p> <p>Provision is made for proxy field measurements, such as NTU (nephelometric turbidity units), can be utilised to substitute for total suspended solids</p> <p>(b) earthworks shall not occur between 1st June and 30th September in any year.</p> <p>The submitter requests that earthworks activities during the winter period is inserted as a matter of discretion under this rule:</p> <p>(a) Earthworks over 3000m2 shall be limited from 1st June to 30th September each year, with a risk-based approach taken to the permitting of earthworks activities during this period, and</p> <p>(b) prior to 1st June, areas to be shut down shall be stabilised against erosion and have sediment controls in place using good management practices in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021)</p>		Accept in part
	David McKevitt	FS34.049	Orogen Limited	9 Te Awarua-o-	Rule P.R23: Earthworks –		Support	See Orogen submission S239.010, S239.011, S239.018 & S230.019	Allow	Adopt submission to enable NTU	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				Porirua Whaitua	restricted discretionary activity.					measurements and undertake risk-based approach to winter works.	
	David McKevitt	FS47.412	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support in part	Meridian agrees clause (b) is unreasonable and unnecessary;	Allow in part	Allow S190.008 by deleting clause (b) and related discretionary matter (8).	Reject
S193.008	Wairarapa Federated Farmers (S193)			General comments	General comments - earthworks	Oppose		Considers the operative NRP earthworks and vegetation clearance rules should remain so the changes are given time to take effect. Considers the rules were a significant shift on the previous plan and it is too soon to unravel the positions discussed and agreed upon through Environment Court-assisted mediation. Opposes removing the permitted and controlled activity rules (Rule R102 and Rule R103) for the construction of new farm tracks. Questions why Rules R102 and R103 have been removed as the conditions for both rules were prescriptive in terms of managing environmental effects. Concerned farm track works that cannot meet the proposed permitted activity rule will now require consent for a restricted discretionary or non-complying activity. Notes earthworks in winter, unless anticipated in a certified farm environment plan (FEP), now require consent for a non-complying activity irrespective of whether the effects of the earthworks can be managed to meet the discharge standards. Concerned to see the implementation of a 'blanket ban' on earthworks for four months of the year as it reduces a farmer's ability to manage and operate their business without additional cost and administrative burden and respond to events in a timely manner. Notes Farmers need the flexibility to be able to restore access if tracks are washed out without having to wait for resource consent to be granted. Opposes the earthworks and vegetation clearance policies and rules in the proposed NRP and seeks relief that the policies and rules in the operative NRP remain.	<p>Seeks to have Rules R102 and R103 reinstated.<p>Make any consequential amendment(s) necessary to give effect to the relief sought.		Reject
	Wairarapa Federated Farmers	FS23.964	Forest & Bird	General comments	General comments - earthworks		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
	Wairarapa Federated Farmers	FS12.1	Diane Strugnell	General comments	General comments - earthworks		Support	For the reasons set out by the submitter. Farming operations, including those to address the wellbeing of people and livestock as well as of the environment, should be able to be managed within existing rules and/or under a farm plan without the need for the added time and cost of a resource consent.	Allow	Amend policy to give effect to the relief sought	Reject
S193.021	Wairarapa Federated Farmers (S193)			2 Interpretation	Earthworks	Oppose		Does not agree it is effective or efficient to propose different definitions for different whaitua. Suggests the operative definition agreed upon during pNRP Environment Court mediation and should be retained	Retain operative definition for all whaitua  Make any consequential amendment(s) necessary to give effect to the relief sought.		Reject
	Wairarapa Federated Farmers	FS1.009	Horticulture New Zealand	2 Interpretation	Earthworks		Support	It is more effective and efficient plan drafting to have the same definition across all whaitua.	Allow	Retain operative definition for all whaitua or otherwise reintroduce the	Reject



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										exclusions for “the harvesting of crops” and “maintenance of orchards and shelterbelts”.	
	Wairarapa Federated Farmers	FS23.977	Forest & Bird	2 Interpretation	Earthworks		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird’s submission points and specific relief.	Reject
	Wairarapa Federated Farmers	FS47.105	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow S193.021.	Reject
	Wairarapa Federated Farmers	FS12.8	Diane Strugnell	2 Interpretation	Earthworks		Support	For the reasons identified by the submitter.	Allow	The whole submission point	Reject
S193.026	Wairarapa Federated Farmers (S193)			2 Interpretation	Stabilisation	Oppose		Suggests retaining the operative definitions for improved efficiency	Delete definition  Make any consequential amendment(s) necessary to give effect to the relief sought.		Reject
	Wairarapa Federated Farmers	FS23.982	Forest & Bird	2 Interpretation	Stabilisation		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird’s submission points and specific relief.	Reject
S193.039	Wairarapa Federated Farmers (S193)			5.2 and 5.3 Discharges to land and water and land use rules	Rule R101: Earthworks – permitted activity.	Oppose		Considers operative rule agreed in pNRP Environment Court mediation and should be retained	Retain operative rule for all whitua  Make any consequential amendment(s) necessary to give effect to the relief sought.		Reject
	Wairarapa Federated Farmers	FS1.020	Horticulture New Zealand	5.2 and 5.3 Discharges to land and water and land use rules	Rule R101: Earthworks – permitted activity.		Support	Rule R101 is relevant to all whitua and should be retained.	Allow	Allow. Retain Rule R101 for all whitua.	Reject
	Wairarapa Federated Farmers	FS23.995	Forest & Bird	5.2 and 5.3 Discharges to land and water and land use rules	Rule R101: Earthworks – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird’s submission points and specific relief.	Accept
	Wairarapa Federated Farmers	FS47.145	Meridian Energy Limited	5.2 and 5.3 Discharges to land and water and	Rule R101: Earthworks – permitted activity.		Support	Meridian opposes aspects of the Whitua-specific rules for earthworks management and, if Meridian’s submission points are accepted, agrees Rule R101 should remain for all Whitua;	Allow	Allow S193.039 and retain Rule R101 for all Whitua.	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				land use rules							
S193.040	Wairarapa Federated Farmers (S193)			5.2 and 5.3 Discharges to land and water and land use rules	Rule R102: Construction of a new farm track – permitted activity.	Oppose		Considers operative rule agreed in pNRP Environment Court mediation and should be retained	Retain operative rule for all whitua  Make any consequential amendment(s) necessary to give effect to the relief sought.		Reject
	Wairarapa Federated Farmers	FS1.021	Horticulture New Zealand	5.2 and 5.3 Discharges to land and water and land use rules	Rule R102: Construction of a new farm track – permitted activity.		Support	Rule R102 is relevant to all whitua and should be retained.	Allow	Allow. Retain Rule R102 for all whitua.	Reject
	Wairarapa Federated Farmers	FS23.996	Forest & Bird	5.2 and 5.3 Discharges to land and water and land use rules	Rule R102: Construction of a new farm track – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
	Wairarapa Federated Farmers	FS47.147	Meridian Energy Limited	5.2 and 5.3 Discharges to land and water and land use rules	Rule R102: Construction of a new farm track – permitted activity.		Support	Meridian opposes aspects of the Whitua-specific rules for earthworks management and, if Meridian's submission points are accepted, agrees Rule R102 should remain for all Whitua;	Allow	Allow S193.040 and retain Rule R102 for all Whitua.	Reject
S193.041	Wairarapa Federated Farmers (S193)			5.2 and 5.3 Discharges to land and water and land use rules	Rule R103: Construction of a new farm track – controlled activity.	Oppose		Considers operative rule agreed in pNRP Environment Court mediation and should be retained	Retain operative rule for all whitua  Make any consequential amendment(s) necessary to give effect to the relief sought.		Reject
	Wairarapa Federated Farmers	FS1.022	Horticulture New Zealand	5.2 and 5.3 Discharges to land and water and land use rules	Rule R103: Construction of a new farm track – controlled activity.		Support	Rule R103 is relevant to all whitua and should be retained.	Allow	Allow. Retain Rule R103 for all whitua.	Reject
	Wairarapa Federated Farmers	FS23.997	Forest & Bird	5.2 and 5.3 Discharges to land and water and land use rules	Rule R103: Construction of a new farm track – controlled activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
	Wairarapa Federated Farmers	FS47.148	Meridian Energy Limited	5.2 and 5.3 Discharges to land and water and land use rules	Rule R103: Construction of a new farm track – controlled activity.		Support	Meridian opposes aspects of the Whitua-specific rules for earthworks management and, if Meridian's submission points are accepted, agrees Rule R103 should remain for all Whitua;	Allow	Allow S193.041 and retain Rule R103 for all Whitua.	Reject
S193.089	Wairarapa Federated Farmers (S193)			8 Whitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Oppose		Considers this is addressed by existing NRP provisions which were recently made operative subsequent to mediated agreements.	Delete P29  Make any consequential amendment(s) necessary to give effect to the relief sought.		Reject
	Wairarapa Federated Farmers	FS23.1045	Forest & Bird	8 Whitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										consistent with Forest & Bird's submission points and specific relief.	
S193.090	Wairarapa Federated Farmers (S193)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Oppose		Considers this is addressed by existing NRP provisions which were recently made operative subsequent to mediated agreements.	Delete P30 Make any consequential amendment(s) necessary to give effect to the relief sought.		Reject
	Wairarapa Federated Farmers	FS23.1046	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S193.091	Wairarapa Federated Farmers (S193)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Not Stated		Considers this is addressed by existing NRP provisions which were recently made operative subsequent to mediated agreements.	Delete P31, or specify application to urban only  Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept in part
	Wairarapa Federated Farmers	FS23.1047	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Wairarapa Federated Farmers	FS47.184	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S193.091 by deleting Policy WH.P31.	Accept
S193.100	Wairarapa Federated Farmers (S193)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		Amend to be consistent with relief sought for national Freshwater Farm Plans	Delete R23  Make any consequential amendment(s) necessary to give effect to the relief sought.		Reject
	Wairarapa Federated Farmers	FS23.1056	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S193.101	Wairarapa Federated Farmers (S193)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Oppose		Retain operative NRP rule	Delete R24  Make any consequential amendment(s) necessary to give effect to the relief sought.		Reject
	Wairarapa Federated Farmers	FS23.1057	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										points and specific relief.	
	Wairarapa Federated Farmers	FS47.273	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support in part	Meridian agrees the operative NRP rule framework is preferable and sufficient;	Allow in part	Allow S191.101 in part by deleting clause (b) and related discretionary matter (8).	Reject
S193.102	Wairarapa Federated Farmers (S193)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.	Oppose		Retain operative NRP rule	Delete R25  Make any consequential amendment(s) necessary to give effect to the relief sought.		Reject
	Wairarapa Federated Farmers	FS23.1058	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
	Wairarapa Federated Farmers	FS47.296	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Support in part	Meridian agrees the non-complying activity status is not necessary or appropriate;	Allow in part	Allow S193.102 by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.	Reject
S193.138	Wairarapa Federated Farmers (S193)			9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Oppose		Considers this is addressed by existing NRP provisions which were recently made operative subsequent to mediated agreements.	Delete P27  Make any consequential amendment(s) necessary to give effect to the relief sought.		Reject
	Wairarapa Federated Farmers	FS23.1094	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	accept
	Wairarapa Federated Farmers	FS47.319	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.		Support in part	Meridian considers that complete retention of soil and sediment on site is not practicable in all situations, including where soil and sediment need to be removed from site in a controlled manner;	Allow in part	Allow S193.138 in part by amending Policy P.P27 as requested for S177.051.	Accept in part
S193.139	Wairarapa Federated Farmers (S193)			9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Oppose		Considers this is addressed by existing NRP provisions which were recently made operative subsequent to mediated agreements.	Delete P28  Make any consequential amendment(s) necessary to give effect to the relief sought.		Reject
	Wairarapa Federated Farmers	FS23.1095	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					earthworks sites.					consistent with Forest & Bird's submission points and specific relief.	
S193.140	Wairarapa Federated Farmers (S193)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose		Considers this is addressed by existing NRP provisions which were recently made operative subsequent to mediated agreements.	Delete P29  Make any consequential amendment(s) necessary to give effect to the relief sought.		Accept in part
	Wairarapa Federated Farmers	FS23.1096	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Wairarapa Federated Farmers	FS47.333	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S193.140.	Accept
S193.149	Wairarapa Federated Farmers (S193)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Amend		Amend to be consistent with relief sought for national Freshwater Farm Plans	Delete  Make any consequential amendment(s) necessary to give effect to the relief sought.		Reject
	Wairarapa Federated Farmers	FS23.1105	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
	Wairarapa Federated Farmers	FS47.395	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support in part	Meridian considers the rule should include associated discharges (including discharges of sediment and/or flocculant) and considers clause (g) is impractical;	Allow in part	Allow S193.149 in part by providing for associated discharges in the chapeau to the rule and deleting clause (g).	Reject
S193.150	Wairarapa Federated Farmers (S193)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Oppose		Retain operative NRP rule	Delete  Make any consequential amendment(s) necessary to give effect to the relief sought.		Reject
	Wairarapa Federated Farmers	FS23.1106	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
	Wairarapa Federated Farmers	FS47.413	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support in part	Meridian agrees clause (b) is unreasonable and unnecessary	Allow in part	Allow S193.150 and retain the rules for earthworks that were negotiated through mediation of the NRP or, as alternative relief, delete clause (b) and related	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										discretionary matter (8).	
S193.151	Wairarapa Federated Farmers (S193)			9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.	Oppose		Retain operative NRP rule	Delete  Make any consequential amendment(s) necessary to give effect to the relief sought.		Reject
	Wairarapa Federated Farmers	FS23.1107	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
	Wairarapa Federated Farmers	FS47.433	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Support in part	Meridian agrees the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;	Allow in part	Allow S193.151 or, as alternative relief, provide for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.	Reject
S2.009	Horokiwi Quarries Ltd (S2)			2 Interpretation	Earthworks	Amend		Requests the definition for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua include the full list of exemptions provided in the existing definition of earthworks, noting amendments are sought to clarify that the exclusions are disjunctive through the use of 'or'. Supports the clarification provided to exemption clause (i) of the existing definition.	Amend the definition of "Earthworks" as follows:  Earthworks For Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua only: The alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, and disturbance of land for the installation of fence posts. Earthworks do not include: (a) cultivation of the soil for the establishment of crops or pasture, or (b) the harvesting of crops, or (c) thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, or (d) the construction, repair, upgrade or maintenance of: (i) pipelines, or (ii) electricity lines and their support structures, including the National Grid, or (iii) telecommunication structures or lines, or (iv) radio communication structures, or (v) firebreaks or fence lines, or (vi) a bore or geotechnical investigation bore, or (e) repair or maintenance of existing roads and tracks, and airfield runways, taxiways, and parking aprons for aircraft, or		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									<p>(f) maintenance of orchards and shelterbelts, or</p> <p>(g) domestic gardening, or</p> <p>(h) repair, sealing or resealing of a road, footpath, driveway, or</p> <p>(i) discharge of cleanfill material to a cleanfill area</p> <p>Except that, for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20, 'earthworks' has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.</p> <p>For all other whaitua: The disturbance of a land surface from the time soil is first disturbed on a site until the time the site is stabilised. Earthworks includes blading, contouring, ripping, moving, removing, placing or replacing soil or earth, by excavation, or by cutting or filling operations, or by root raking.</p> <p>Earthworks do not include: (a) cultivation of the soil for the establishment of crops or pasture, and or (b) the harvesting of crops, and or (c) thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and or (d) the construction, repair, upgrade or maintenance of: (vii) pipelines, and or (viii) electricity lines and their support structures, including the National Grid, and or (ix) telecommunication structures or lines, and or (x) radio communication structures, and or (xi) firebreaks or fence lines, and or (xii) a bore or geotechnical investigation bore, and or (e) repair or maintenance of existing roads and tracks, and airfield runways, taxiways, and parking aprons for aircraft, and or (f) maintenance of orchards and shelterbelts, and or (g) domestic gardening, and or (h) repair, sealing or resealing of a road, footpath, driveway, and or (i) discharge of cleanfill material to a cleanfill area</p>		
	Horokiwi Quarries Ltd	FS47.046	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity	Allow	Allow S2.009.	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S2.025	Horokiwi Quarries Ltd (S2)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Amend		<p>Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Supports in principle but seeks amendments to this policy to clarify its intent and practicability as described below. Considers the word “risk” should be replaced with “adverse effects” in the chapeau, as resource management policies should seek to manage actual or potential adverse effects of an activity, rather than risks generally. Considers the requirement to retain soil and sediment on site under clause (a) does not recognise that soil and sediment may need to be removed from site in a controlled manner (for example, to a clean fill area). Considers clause (b) should be qualified with “where practicable” to recognise that any limits placed on land disturbance should be reasonable and proportionate, particularly in the context of the good management practices already required by clause (a).</p>	<p>Amend Policy WH.P29 as follows:</p> <p>Policy WH.P29: Management of earthworks</p> <p>The risk adverse effects of sediment discharges from earthworks shall be managed by:</p> <p>(a) requiring retention of soil and sediment on the land undertaking earthworks in accordance with using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in general accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region(2021), for the duration of the land disturbance, and</p> <p>(b) limiting where practicable, the amount of land disturbed at any time, and</p> <p>(c) designing and implementing earthworks with knowledge of the existing environmental site constraints, specific engineering requirements and implementation of controls to limit the discharge of sediment to receiving environments, and</p> <p>(d) requiring erosion and sediment control measures to be installed prior to, and during earthworks and ensuring those controls remain in place and are maintained until the land is stabilised against erosion.</p>		Accept in part
S2.026	Horokiwi Quarries Ltd (S2)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Amend		<p>Requests policy is changed to refer to discharges to natural receiving waterbodies rather than to “an existing or new stormwater network” and “artificial watercourse”. Considers the requirement under clause (c) to have a “suitably qualified person” monitor the discharge is not practicable in all circumstances and will result in an unreasonable cost burden on consent holders. Seeks that the clause is amended to provide some discretion and to also provide for a “suitably trained person” rather than a qualified individual.</p>	<p>Amend Policy WH.P30 as follows:</p> <p>Policy WH.P30: Discharge standard for earthworks</p> <p>The discharge of sediment from earthworks over an area greater than 3,000m<sup>2</sup> shall:</p> <p>(a) not exceed 100g/m<sup>3</sup> at the point of discharge where the discharge is to a surface water body, or coastal water, stormwater network or to an artificial watercourse, except that when the discharge is to a river with background total suspended solids that exceed 100g/m<sup>3</sup>, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than:</p> <p>(i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or</p> <p>(ii) 30% in any other river, and</p> <p>(b) be managed using good management practices in accordance</p>		Reject



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									with the GWRC Erosion and Sediment Control Guidelines for the Wellington Region (2021), to achieve the discharge standard in (a), and (c) where required, be monitored by a suitably qualified or trained person, and the results reported to the Wellington Regional Council.		
S2.027	Horokiwi Quarries Ltd (S2)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose		Opposes policy in its entirety. Considers the requirement for all earthworks over 3,000m2 to be shut down over the winter months is inappropriate, as it does not recognise circumstances where earthworks need to occur over those months, including quarrying activities, and is not supported by sufficient evidence. Considers that in instances where earthworks are unavoidable during winter, careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Considers that as the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021) provides a pathway for earthworks to be undertaken during the winter months subject to careful management (refer specifically to section G5.0 of the guideline), a pathway should remain available to applicants through the consent process. Considers Section 32 Evaluation justification to be very limited, other than the climatic characteristics of the winter months being more likely to cause increased sediment discharges. Questions this assumption as rainfall events that would cause uncontrolled releases of sediment can occur at any time of the year, and will only increase with the effects of climate change.	Delete the policy.		Accept
	Horokiwi Quarries Ltd	FS47.174	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S2.027 by deleting Policy WH.P31.	Accept
S2.037	Horokiwi Quarries Ltd (S2)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		Considers the use of “and” at the end of condition (b) excludes all earthworks that are not related to implementing farm erosion risk treatment plans or farm environmental plans from the permitted activity rule. As a result, all other earthworks, regardless of size or whether they meet conditions (c) to (h) will be a restricted discretionary activity under rule WH.R24. Considers it is not efficient or effective to require resource consent for all earthworks, regardless of scale. Nor does it appear to be consistent with policies WH.P30 and WH.P31, which emphasise controlling earthworks over 3,000m2. The submitter notes that the inclusion of associated discharges to water is necessary to ensure the rule relates to a regional function. Without doing so, this rule would simply be regulating land use which is a territorial authority function. Considers clause (g) should not be included in Rule WH.R23 as discharges associated with earthworks are managed under rule (R91). Considers clause (g) is inappropriate as it's not consistent with the minor discharges rule, which permits a minor discharge of suspended solids to surface water bodies or coastal water. Opposes the rule being included within the freshwater planning instrument as the purpose of the rule is to manage land use for soil conservation. Given that the rule does not provide for discharges associated with	Consider Rule WH.R23 under a Part 1 Schedule 1 process.  Amend Rule WH.R23 as follows: Rule WH.R23: Earthworks – permitted activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface waterbody or coastal water, including from a stormwater network, is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								earthworks, there is no justification for including it in the freshwater planning instrument. The submitter seeks that it be reallocated to the Part 1 Schedule 1 planning instrument.	earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).		
	Horokiwi Quarries Ltd	FS47.251	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Meridian agrees that the chapeau of the rule needs to provide for associated discharges (including discharges of sediment and/or flocculant) and considers that clause (g) is unachievable and unreasonable;	Allow	Allow S2.037.	Accept in part
S2.038	Horokiwi Quarries Ltd (S2)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		Opposes the direction to avoid earthworks over the winter months. Considers prohibiting earthworks over the winter months is not supported by evidence and is not reasonable, particularly for activities that are required year-round such as quarrying. Considers the intent of the policy direction (to minimise the risk of an uncontrolled discharge) can continue to be appropriately managed through matters of discretion – specifically matter 1. Therefore it is requested clause (b) and matter of discretion 8 be deleted.	Amend Rule WH.R24 as follows: Rule WH.R24: Earthworks – restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year. Matters for discretion 1. The location, area, scale, volume, duration and staging and timing of works 2. The design and suitability of erosion of sediment control measures including consideration of hazard mitigation and the risk of accelerated soil erosion associated the staging of works and progressive stabilisation 3. The placement and treatment of stockpiled materials on the site, including requirements to remove material if it is not to be reused on the site 4. The proportion of unstabilised land in the catchment 5. The adequacy and efficiency of stabilisation devices for sediment control 6. Any adverse effects on: (i) groundwater, surface water bodies and their margins, particularly surface water bodies within sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori customary use) or Schedule I (important trout fishery rivers and spawning waters) (ii) group drinking water supplies and community drinking water supplies (iii) mauri, water quality (including water quality in the coastal marine area), aquatic and marine ecosystem health, aquatic and riparian habitat quality, indigenous biodiversity values, mahinga kai and critical life cycle periods for indigenous aquatic species (iv) the natural character of lakes, rivers, natural wetlands and their margins and the coastal environment (v) natural hazards, land stability, soil erosion, sedimentation and flood hazard management including the use of natural buffers 7. Duration of the consent 8. Preparation required for the close-down period (from 1st June to 30th		

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									September each year) and any maintenance activities required during this period 9. Monitoring and reporting requirements		
	Horokiwi Quarries Ltd	FS47.261	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S2.038.	Accept in part
S2.039	Horokiwi Quarries Ltd (S2)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.	Oppose		Considers that the non-complying activity rule is not sufficiently justified in the section 32 evaluation and does not appropriately provide for activities that do not meet restricted discretionary activity conditions, but which can otherwise be managed through consent conditions as a discretionary activity.	Amend Rule WH.R25 as follows: Rule WH.R25: Earthworks – non-complying discretionary activity Earthworks, and the associated discharge of sediment into a surface water body or coastal water or onto or into land where it may enter a surface water body or coastal water from earthworks, including via a stormwater network, that does not comply with Rule WH.R24 is a non-complying discretionary activity.		Accept
	Horokiwi Quarries Ltd	FS47.292	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Support in part	The non-complying activity status is not the most effective or efficient approach. The potential sedimentation and water contamination issues can be comprehensively addressed through effects based conditions. Meridian considers winter earthworks should be provided for as restricted discretionary activities, subject to conditions. Non-compliance with effects- based conditions should be discretionary activity, not non- complying activity;	Allow in part	Allow S2.039 in part by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.	Accept
S206.004	Winstone Aggregates (S206)			General comments	General comments - definitions	Amend		Seeks the provision of a definition for “significant mineral resources”, derived from the operative RPS. Notes Method 52 of the operative RPS, which requires significant mineral resources to be spatially identified. Seeks for this to be undertaken concurrently with PC1 and for the definition to reference the associated mapping.	Insert new definition of “significant mineral resources” as follows:  Significant mineral resources Has the same meaning as in the Wellington Regional Policy Statement (as set out below): Deposits of minerals, the extraction of which is of potential importance in order to meet the current or future mineral needs of the region or nation.		Reject
S206.017	Winstone Aggregates (S206)			General comments	General comments - earthworks	Oppose		Considers earthworks (excluding earthworks on a farm) will be at least a restricted discretionary activity, regardless of scale or adverse effect. Notes the conjunctive requirement was not intended for all clauses. Seeks an urgent variation is issued to correct the permitted rule. Notwithstanding this correction, opposes the rule framework and associated policy direction that restricts earthworks over winter months, as it does not account for long-term ongoing permanent earthwork activities that occur year-round, such as quarrying activities. Considers insufficient justification is provided in the s32 evaluation for the shut down period, including an assessment of costs and benefits, or direct and indirect effects to quarrying activities. Considers restrictions will increase cost and length of construction periods, and will impact supply of aggregate. Disagrees with the assumption that increased sediment discharges are more likely during winter months, noting that unpredictable rainfall events can occur at any time of year, which will increase with climate change. Further notes that	<p>Remove the shutdown period over winter months. Amend non-complying activity status to discretionary.		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								receiving environments are less vulnerable during winter months as water temperatures are lower and flows are higher. Considers non-complying activity status for earthworks not meeting restricted discretionary conditions is onerous, noting that replacement earthworks consents for an operational quarry would be subject to the rule. Considers this does not recognise the importance of local source aggregate and is contrary to the Regional Policy direction. Notes that where non-complying activity status is in practical terms no different than discretionary activity status, then the less onerous activity status is the most appropriate.			
	Winstone Aggregates	FS10.8	Enviro NZ Services Ltd (Enviro NZ)	General comments	General comments - earthworks		Support	Cleanfills, managed fills and landfills all need to continue earthworks over the winter period. The rules need to account for these longterm ongoing permanent earthwork activities.	Allow	Support the status to become discretionary if not restricted discretionary. Withdrawal of the winter shutdown period is supported unless exclusions are applied to cleanfills, managed fills and landfills.	Accept
S206.023	Winstone Aggregates (S206)			2 Interpretation	Earthworks	Oppose		Seeks for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua to include all exemptions provided in the existing definition of earthworks. Notes the use of “and” implies all earthworks exclusions are conjunctive and seeks clarification that the exclusions are disjunctive through the use of “or”. Supports clarification provided to exemption clause (i) of the existing definition.	Amend definition as follows:  For Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua only: The alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, and disturbance of land for the installation of fence posts. Earthworks do not include: (a) cultivation of the soil for the establishment of crops or pasture, or (b) the harvesting of crops, or (c) thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, or (d) the construction, repair, upgrade or maintenance of: (i) pipelines, or (ii) electricity lines and their support structures, including the National Grid, or (iii) telecommunication structures or lines, or (iv) radio communication structures, or (v) firebreaks or fence lines, or (vi) a bore or geotechnical investigation bore, or (d) repair or maintenance of existing roads and tracks, and airfield runways, taxiways, and parking aprons for aircraft, or (e) maintenance of orchards and shelterbelts, or (f) domestic gardening, or (g) repair, sealing or resealing of a road, footpath, driveway, or (h) discharge of cleanfill material to a cleanfill area		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									<p>Except that, for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20, 'earthworks' has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.</p> <p>Amend definition as follows:</p> <p>For all other whaitua:  The disturbance of a land surface from the time soil is first disturbed on a site until the time the site is stabilised.  Earthworks includes blading, contouring, ripping, moving, removing, placing or replacing soil or earth, by excavation, or by cutting or filling operations, or by root raking.  Earthworks do not include:  (a) cultivation of the soil for the establishment of crops or pasture, and or  (b) the harvesting of crops, and or  (c) thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and or  (d) the construction, repair, upgrade or maintenance of:  (vii) pipelines, and or  (viii) electricity lines and their support structures, including the National Grid, and or  (ix) telecommunication structures or lines, and or  (x) radio communication structures, and or  (xi) firebreaks or fence lines, and or  (xii) a bore or geotechnical investigation bore, and or  (e) repair or maintenance of existing roads and tracks, and airfield runways, taxiways, and parking aprons for aircraft, and or  (f) maintenance of orchards and shelterbelts, and or  (g) domestic gardening, and or  (h) repair, sealing or resealing of a road, footpath, driveway, and or  (i) discharge of cleanfill material to a cleanfill area</p>		
	Winstone Aggregates	FS28.201	Waka Kotahi NZ Transport Agency	2 Interpretation	Earthworks		Support	Exclusion will clarify repair and maintenance ((d) and (g) of proposed) is able to be undertaken.	Allow	Not stated	Reject
	Winstone Aggregates	FS47.106	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow S206.023.	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Winstone Aggregates	FS10.22	Enviro NZ Services Ltd (Enviro NZ)	2 Interpretation	Earthworks		Support	As per submission point	Allow	All	Reject
S206.046	Winstone Aggregates (S206)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Amend		Considers the policy focuses on “risk” rather than effect. Considers the relevance of risk under the RMA is primarily associated with natural hazards rather than a potential discharge. Seeks replacement of risk with “adverse effects” to align with RMA Part 2. Considers clause (a) refers to an outcome that is sought, rather than an activity or effect. Considers the direction of clause (b) to limit the amount of land disturbed is not always practicable.	Amend policy as follows:  Policy WH.P29: Management of earthworks The risk adverse effects associated with of sediment discharges from earthworks shall be managed by: (a) requiring retention of soil and sediment on the land undertaking earthworks in accordance with using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in general accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), for the duration of the land disturbance, and (b) where practicable, limiting the amount of land disturbed at any time, and (c) designing and implementing earthworks with knowledge of the existing environmental site constraints, specific engineering requirements and implementation of controls to limit the discharge of sediment to receiving environments, and (d) requiring erosion and sediment control measures to be installed prior to, and during earthworks and ensuring those controls remain in place and are maintained until the land is stabilised against erosion.		Accept in part
S206.047	Winstone Aggregates (S206)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Oppose		Notes the policy refers to “an existing or new stormwater network” and “artificial watercourse” as a receiving environment. Considers the policy can only regulate discharges where they enter “water”, in accordance with RMA s15, and that water within a stormwater network is not subject to Regional Council jurisdiction. Further notes artificial watercourses are often piped or within tanks and therefore not subject to RMA s15. Seeks changes to only refer to discharges to natural receiving waterbodies.Considers the requirement in clause (c) for a “suitably qualified person” to monitor the discharge is not always practicable and will be unreasonably costly. Seeks amendment to provide discretion and to provide for a “suitably trained person”. Considers the policy particularly prescriptive, reflecting conditions of a rule or consent rather than a policy directive. Submitter refers to their relief sought for the definition of “earthworks”, to recognise current exceptions in the Operative NRP. Considers the policy will apply to earthworks of all kinds and scales. Considers the proposed policy and rule framework results in impracticalities due to the broad definition of earthworks, which is often not proportionate to the effects being managed.	Amend policy as follows:  Policy WH.P30: Discharge standard for earthworks The discharge of sediment from earthworks over an area greater than 3,000m2 shall: (a) not exceed 100g/m3 at the point of discharge where the discharge is to a surface water body, or coastal water, stormwater network or to an artificial watercourse, except that when the discharge is to a river with background total suspended solids that exceed 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) be managed using good management practices in accordance with the GWRC Erosion and Sediment Control Guidelines for the Wellington Region (2021), to achieve the discharge standard in (a), and		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									(c) where required, be monitored by a suitably qualified or trained person, and the results reported to the Wellington Regional Council.		
	Winstone Aggregates	FS45.090	Kāinga Ora – Homes and Communities	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Support in part	Subject to the Kāinga Ora primary submission, Kāinga Ora agrees that the policy can only regulate discharges where they enter "water", as defined by s2 and in accordance with s15 of the RMA. Kāinga Ora support changes to the earthworks definition in line with the Kāinga Ora primary submission.	Allow in part	<p>Notes the policy refers to "an existing or new stormwater network" and "artificial watercourse" as a receiving environment. Considers the policy can only regulate discharges where they enter "water", in accordance with RMA s15, and that water within a stormwater network is not subject to Regional Council jurisdiction. Further notes artificial watercourses are often piped or within tanks and therefore not subject to RMA s15. Seeks changes to only refer to discharges to natural receiving waterbodies. Considers the requirement in clause (c) for a "suitably qualified person" to monitor the discharge is not always practicable and will be unreasonably costly. Seeks amendment to provide discretion and to provide for a "suitably trained person". Considers the policy particularly prescriptive, reflecting conditions of a rule or consent rather than a policy directive.</p> <p>Submitter refers to their relief sought for the definition of "earthworks", to recognise current exceptions in the Operative NRP. Considers the policy will apply to earthworks of all kinds and scales. Considers the proposed policy and rule framework results in impracticalities due to the broad definition of earthworks, which is often not proportionate to the effects being managed.</p>	Accept in part



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S206.048	Winstone Aggregates (S206)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose		Considers the policy does not anticipate activities that require earthworks year-round such as quarrying. Considers shutting down winter earthworks within an active quarry will adversely impact regional aggregate supply and the ability to respond to a natural disaster. Considers insufficient justification is provided in the s32 evaluation for the shut down period. Disagrees with the assumption that increased sediment discharges are more likely during winter months, noting that unpredictable rainfall events can occur at any time of year, which will increase with climate change. Further notes that receiving environments are less vulnerable during winter months as water temperatures are lower and flows are higher. Seeks removal of the policy and considers risk associated with unpredictable weather events can be managed through existing provisions.	Delete policy		Accept
	Winstone Aggregates	FS50.178	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	NZCF supports the submission and considers that a pathway should be provided for earthworks during winter months consistent with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).	Allow	Not stated	Accept
S206.059	Winstone Aggregates (S206)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		Notes the conjunctive requirement in clause (b) is an error, and has been corrected to “or” with RMA Clause 16. On the basis of this correction, the submitter is neutral to the rule. Notes the rule only relates to earthworks and not the associated discharge to water and considers this an error given the associated restricted discretionary and non-complying rules refer to the associated discharge. Considers condition (g) would create an inability for any earthworks to meet the rule, as any exposed sediment would result in a discharge onto land where it may enter a surface water body. Notes the rule would apply alongside Rule R91, which specifies further discharge parameters. Opposes the rule being subject to the Freshwater Planning Process, as it relates to erosion and soil conservation rather than specifically freshwater.	Consider Rule WH.R23 under a Part 1 Schedule 1 process.  Amend Rule WH.R23 :  Rule WH.R23: Earthworks – permitted activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including from a stormwater network, is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not exceed 3,000m <sup>2</sup> per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).		
	Winstone Aggregates	FS47.257	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support in part	Meridian agrees the rule should include associated discharges (including discharges of sediment and/or flocculant) and considers clause (g) is impractical, unachievable and unreasonable;	Allow in part	Allow S206.059.	Accept in part
S206.060	Winstone Aggregates (S206)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		Opposes direction to avoid earthworks over winter months, per the submitter's submission on Policy WH.P31. Considers the rule, in conjunction with Rule WH.R25 and Policy WH.P31 effectively prohibits earthworks over winter months. Considers there is insufficient evidence to support this, and it is unreasonable for earthworks to cease over this period, particularly year-round activities such as quarrying. Considers the intent of the policy direction to minimise the risk of an uncontrolled discharge can be appropriately managed through matter of discretion 1. Therefore, seeks clause (b) and matter of discretion 8 are deleted.	Amend rule as follows:  Rule WH.R24: Earthworks – restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year. Matters for discretion 1. The location, area, scale, volume, duration and staging and timing of works 2. The design and suitability of erosion of sediment control measures including consideration of hazard mitigation and the risk of accelerated soil erosion associated the staging of works and progressive stabilisation 3. The placement and treatment of stockpiled materials on the site, including requirements to remove		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									<p>material if it is not to be reused on the site</p> <p>4. The proportion of unstabilised land in the catchment</p> <p>5. The adequacy and efficiency of stabilisation devices for sediment control</p> <p>6. Any adverse effects on:</p> <p>(i) groundwater, surface water bodies and their margins, particularly surface water bodies within sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori customary use) or Schedule I (important trout fishery rivers and spawning waters)</p> <p>(ii) group drinking water supplies and community drinking water supplies</p> <p>(iii) mauri, water quality (including water quality in the coastal marine area), aquatic and marine ecosystem health, aquatic and riparian habitat quality, indigenous biodiversity values, mahinga kai and critical life cycle periods for indigenous aquatic species</p> <p>(iv) the natural character of lakes, rivers, natural wetlands and their margins and the coastal environment</p> <p>(v) natural hazards, land stability, soil erosion, sedimentation and flood hazard management including the use of natural buffers</p> <p>7. Duration of the consent</p> <p>8. Preparation required for the close-down period (from 1st June to 30th September each year) and any maintenance activities required during this period</p> <p>9. Monitoring and reporting requirements</p>		
	Winstone Aggregates	FS47.274	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S206.060.	Accept in part
S206.061	Winstone Aggregates (S206)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.	Oppose		Opposes non-complying activity status. Considers the rule, in conjunction with Policy WH.P31, effectively prohibits earthworks during winter months. Considers there is insufficient evidence to support this, and that it does not recognise activities that are required year-round. Seeks amendment to discretionary activity status, subject to other relief sought for the insertion of two rules relating to quarrying activities associated with significant mineral resources (Rules “WH.R4A” and “WH.R8A”) being implemented. Considers discretionary activity status will enable consideration of all relevant effects while accepting that not all earthworks will be contrary to the NRP.	Amend rule as follows:  Rule WH.R25: Earthworks – non-complying discretionary activity Earthworks, and the associated discharge of sediment into a surface water body or coastal water or onto or into land where it may enter a surface water body or coastal water from earthworks, including via a stormwater network, that does not comply with Rule WH.R24 is a non-complying discretionary activity.		Accept in part
S206.074	Winstone Aggregates (S206)			9 Te Awarua-o-	Policy P.P27: Management	Amend		Considers the policy focuses on “risk” rather than effect. Considers the relevance of risk under the RMA is primarily associated with natural hazards rather	Policy P.P27: Management of earthworks The risk adverse effects associated		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				Porirua Whaitua	of earthworks sites.			than a potential discharge. Seeks replacement of risk with “adverse effects” to align with RMA Part 2. Considers clause (a) refers to an outcome that is sought, rather than an activity or effect. Considers the direction of clause (b) to limit the amount of land disturbed is not always practicable.	with of sediment discharges from earthworks shall be managed by: Amend policy as follows:  (a) requiring retention of soil and sediment on the land undertaking earthworks in accordance with using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in general accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), for the duration of the land disturbance, and (b) where practicable, limiting the amount of land disturbed at any time, and (c) designing and implementing earthworks with knowledge of the existing environmental site constraints, specific engineering requirements and implementation of controls to limit the discharge of sediment to receiving environments, and (d) requiring erosion and sediment control measures to be installed prior to, and during earthworks and ensuring those controls remain in place and are maintained until the land is stabilised against erosion.		
	Winstone Aggregates	FS47.320	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.		Support	Meridian agrees that complete retention of soil and sediment on site is not practicable in all situations, including where soil and sediment need to be removed from site in a controlled manner;	Allow	Allow S206.074 to the extent any amendments are consistent with the relief requested for S177.051.	Accept in part
S206.075	Winstone Aggregates (S206)			9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Amend		Notes the policy refers to “an existing or new stormwater network” and “artificial watercourse” as a receiving environment. Considers the policy can only regulate discharges where they enter “water”, in accordance with RMA s15, and that water within a stormwater network is not subject to Regional Council jurisdiction. Further notes artificial watercourses are often piped or within tanks and therefore not subject to RMA s15. Seeks changes to only refer to discharges to natural receiving waterbodies.Considers the requirement in clause (c) for a “suitably qualified person” to monitor the discharge is not always practicable and will be unreasonably costly. Seeks amendment to provide discretion and to provide for a “suitably trained person”. Considers the policy particularly prescriptive, reflecting conditions of a rule or consent rather than a policy directive.	Amend policy as follows:  Policy P.P28: Discharge standard for earthworks The discharge of sediment from earthworks over an area greater than 3,000m2 shall: (a) not exceed 100g/m3 at the point of discharge where the discharge is to a surface water body, or coastal water, stormwater network or to an artificial watercourse, except that when the discharge is to a river with background total suspended solids that exceed 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) be managed using good management practices in accordance with the GWRC Erosion and Sediment Control Guidelines for the Wellington Region (2021), to achieve the discharge standard in (a), and		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									(c) where required, be monitored by a suitably qualified or trained person, and the results reported to the Wellington Regional Council.		
S206.076	Winstone Aggregates (S206)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose		Considers the policy does not anticipate activities that require earthworks year-round such as quarrying. Considers shutting down winter earthworks within an active quarry will adversely impact regional aggregate supply and the ability to respond to a natural disaster. Considers insufficient justification is provided in the s32 evaluation for the shut down period. Disagrees with the assumption that increased sediment discharges are more likely during winter months, noting that unpredictable rainfall events can occur at any time of year, which will increase with climate change. Further notes that receiving environments are less vulnerable during winter months as water temperatures are lower and flows are higher. Seeks removal of the policy and considers risk associated with unpredictable weather events can be managed through existing provisions.	Delete policy		Accept
	Winstone Aggregates	FS16.173	Woodridge Holdings Ltd	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Not stated	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. 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.	Allow	Delete policy and make earthworks greater than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	Winstone Aggregates	FS50.179	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	NZCF supports the submission and considers that a pathway should be provided for earthworks during winter months consistent with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).	Allow	Not stated	Accept
S206.087	Winstone Aggregates (S206)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Amend		Notes the conjunctive requirement in clause (b) is an error, and has been corrected to “or” with RMA Clause 16. On the basis of this correction, the submitter is neutral to the rule. Notes the rule only relates to earthworks and not the associated discharge to water and considers this an error given the associated restricted discretionary and non-complying rules refer to the associated discharge. Considers condition (g) would create an inability for any earthworks to meet the rule, as any exposed sediment would result in a discharge onto land where it may enter a surface water body. Notes the rule would apply alongside Rule R91, which specifies further discharge parameters. Opposes the rule being subject to the Freshwater Planning Process, as it relates to erosion and soil conservation rather than specifically freshwater.	Consider Rule P.R22 under a Part 1 Schedule 1 process.  Amend Rule P.R22 as follows: Rule P.R22: Earthworks – permitted activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including from a stormwater network, is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).		
	Winstone Aggregates	FS47.396	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support in part	Meridian agrees the rule should include associated discharges (including discharges of sediment and/or flocculant) and considers clause (g) is impractical, unachievable and unreasonable;	Allow in part	Allow S206.087.	Accept
S206.088	Winstone Aggregates (S206)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Amend		Opposes direction to avoid earthworks over winter months, per the submitter's submission on Policy P.P29. Considers the rule, in conjunction with Rule P.R24 and Policy P.P29 effectively prohibits earthworks over winter months. Considers there is insufficient evidence to support this, and it is unreasonable for earthworks to cease over this period, particularly year-round activities such as quarrying. Considers the intent of the policy direction to minimise the risk of an uncontrolled discharge can be appropriately managed through matter of discretion 1. Therefore, seeks clause (b) and matter of discretion 8 are deleted.	Amend rule as follows:  Rule P.R23: Earthworks – restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule P.R22 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year. Matters for discretion 1. The location, area, scale, volume,		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									<p>duration and staging and timing of works</p> <p>2. The design and suitability of erosion of sediment control measures including consideration of hazard mitigation and the risk of accelerated soil erosion associated the staging of works and progressive stabilisation</p> <p>3. The placement and treatment of stockpiled materials on the site, including requirements to remove material if it is not to be reused on the site</p> <p>4. The proportion of unstabilised land in the catchment</p> <p>5. The adequacy and efficiency of stabilisation devices for sediment control</p> <p>6. Any adverse effects on:</p> <p>(i) groundwater, surface water bodies and their margins, particularly surface water bodies within sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori customary use) or Schedule I (important trout fishery rivers and spawning waters)</p> <p>(ii) group drinking water supplies and community drinking water supplies</p> <p>(iii) mauri, water quality (including water quality in the coastal marine area), aquatic and marine ecosystem health, aquatic and riparian habitat quality, indigenous biodiversity values, mahinga kai and critical life cycle periods for indigenous aquatic species</p> <p>(iv) the natural character of lakes, rivers, natural wetlands and their margins and the coastal environment</p> <p>(v) natural hazards, land stability, soil erosion, sedimentation and flood hazard management including the use of natural buffers</p> <p>7. Duration of the consent</p> <p>8. Preparation required for the close-down period (from 1st June to 30th September each year) and any maintenance activities required during this period</p> <p>9. Monitoring and reporting requirements</p>		
	Winstone Aggregates	FS47.414	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S206.088.	Accept
S206.089	Winstone Aggregates (S206)			9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.	Oppose		Opposes non-complying activity status. Considers the rule, in conjunction with Policy P.P29, effectively prohibits earthworks during winter months. Considers there is insufficient evidence to support this, and that it does not recognise activities that are required year-round. Seeks amendment to discretionary activity	<p>Amend rule as follows:</p> <p>Rule P.R24: Earthworks – non-complying discretionary activity</p> <p>Earthworks, and the associated discharge of sediment into a surface</p>		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								status, subject to other relief sought for the insertion of rules relating to quarrying activities associated with significant mineral resources (Rules "WH.R4A", "WH.R8A", "P.R4A" and "P.R8A") being implemented. Considers discretionary activity status will enable consideration of all relevant effects while accepting that not all earthworks will be contrary to the NRP.	water body or coastal water or onto or into land where it may enter a surface water body or coastal water from earthworks, including via a stormwater network, that does not comply with Rule P.R24 is a non-complying discretionary activity.		
	Winstone Aggregates	FS47.434	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Support in part	Meridian agrees the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;	Allow in part	Allow S206.089 in part by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.	Accept in part
S209.013	Enviro NZ Services Ltd (Enviro NZ) (S209)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Support		Not stated	Not stated		Accept in part
S209.014	Enviro NZ Services Ltd (Enviro NZ) (S209)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Neutral		Not stated	Not stated		Accept
S209.015	Enviro NZ Services Ltd (Enviro NZ) (S209)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Neutral		Not stated	Not stated		Accept
S209.029	Enviro NZ Services Ltd (Enviro NZ) (S209)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Support		Not stated	Not stated		Accept
S209.030	Enviro NZ Services Ltd (Enviro NZ) (S209)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Neutral		Not stated	Not stated		Accept
S209.031	Enviro NZ Services Ltd (Enviro NZ) (S209)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.	Support		Not stated	Not stated		Accept
S209.040	Enviro NZ Services Ltd (Enviro NZ) (S209)			9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Support		Not stated	Retain as notified		Accept in part
S209.041	Enviro NZ Services Ltd (Enviro NZ) (S209)			9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Neutral		Not stated	Not stated		Accept
S209.042	Enviro NZ Services Ltd (Enviro NZ) (S209)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut	Neutral		Not stated	Not stated		Accept



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					down of earthworks.						
S209.055	Enviro NZ Services Ltd (Enviro NZ) (S209)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Support		Not stated	Not stated		Accept
S209.056	Enviro NZ Services Ltd (Enviro NZ) (S209)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Neutral		Not stated	Not stated		Accept
S209.057	Enviro NZ Services Ltd (Enviro NZ) (S209)			9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.	Support		Not stated	Not stated		Accept
S210.006	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust. (S210)			2 Interpretation	Earthworks	Amend		Supports the exception to earthworks definition that adopts the definition 'earthworks' contained in the NES-PF for the purposes of the rules relating to plantation (commercial) forestry, but notes NES-PF referred to has been superseded by the NPS-CF and seek for this updated NES-PF to be referenced in the definition.	Seeks definition of 'earthworks' (subject to update to the new NES-CF) be retained as currently written.		Accept
S210.010	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust. (S210)			2 Interpretation	Stabilisation	Support		Not stated	Seeks definition of 'stabilisation' be retained as currently written.		Accept
S210.035	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust. (S210)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Support		Supports the managing of the risk of sediment discharges from earthworks using best practise management which is considered reasonable and pragmatic.	Retain WH.P29 as notified		Accept in part
S210.036	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust. (S210)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Support		Supports the standards for managing the discharge of sediment from earthworks over an area greater than 3,000m2 which are considered reasonable and pragmatic.	Retain WH.P30 as notified		Accept in part
S210.037	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust. (S210)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose		Opposes winter shut down period for earthworks over 3,000m2 as the requirements are onerous and will delay developments, result in unnecessary costs and are not required with the standards set in Policy WH.P30 and included in the rules (note the submitter opposes the shut down period being included in Rule WH.R24 below). Considers there does not appear to be sufficient rationale to justify shut down period and notes winter works are totally appropriate to be undertaken if the soil type provides for this and sufficient management of earthworks controls are provided to manage effects, and or during construction a contractor has demonstrated they can work effectively in these conditions and the project requires works in this period. This is regularly based on the performance of a contractor, winter works are able to be undertaken and in many cases is allowed for and assessed as being acceptable in resource	Delete WH.P31		Accept

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								consent applications. This operational performance standard that is normally site specifically assessed should be deleted as a policy.			
	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	FS22.029	Cannon Point Development Limited (Ltd.)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Agree with relief sought and supporting reasons as they generally align with Cannon Point Development Ltd.'s submission.	Allow	Support the relief sought to delete this policy. Support all the submitter's reasoning.	Accept
S210.051	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust. (S210)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Support		Support Rule WH.23.	Retain WH.23 as notified		Accept in part
S210.052	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust. (S210)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Oppose		Supports the restricted discretionary activity status for earthworks and associated discharges subject to the conditions and matters of discretion listed which are considered reasonable and pragmatic. Oppose shut down period for earthworks included condition (b) and matter of discretion (8) restricting winter works and preparation for closedown for reasons outlined in Submission Point #29 of the original submission relating to Policy WH.P31.	Seeks intent and wording of Rule WH.R24 be retained as written, except for the deletion of Clause (b).		Reject
	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	FS47.275	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support in part	Meridian agrees clause (b) is unreasonable and unnecessary;	Allow in part	Allow S210.052 by deleting clause (b) and related discretionary matter (8).	Reject
S210.053	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust. (S210)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.	Oppose		Considers non-complying activity status for earthworks that do not comply with discretionary activity Rule WH.R24 onerous and unnecessary and will mean that consents where effects can be effectively managed, will not meet the threshold test and cannot be considered for consent. Consider a discretionary activity status is appropriate for a non-compliance with one or more of the conditions and matters of discretion as the adverse effects of that part of the activity that does not comply can be identified and assessed, and the application can be declined if the adverse effects are inappropriate and cannot be mitigated.	Recategorize WH.R25 from non-complying to a discretionary activity		Accept
	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	FS47.297	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Support in part	Meridian agrees the non-complying activity status is onerous, particularly for earthworks associated with large scale regionally significant infrastructure projects;	Allow in part	Allow S210.053 by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.	Accept
S211.017	Hutt City Council (S211)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Amend		Disagrees with the s32 evaluation, which states that there is higher risk of sediment discharge during the winter period (June-September). Considers that large storm events can occur throughout the year, resulting in large sediment discharges. Considers that earthworks during the winter period may be appropriate when there is a poor summer earthworks period due to adverse weather. Considers a BAU	Delete policy Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								approach for winter earthworks should be maintained as a standard condition of consent as a discretionary activity which would allow GW to provide permits to undertake earthworks within this period as appropriate and subject to conditions.	management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).		
	Hutt City Council	FS1.048	Horticulture New Zealand	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Winter shutdown of ancillary rural earthworks would shut down normal agricultural and horticultural practice. Exclude these activities directly or delete the policy.	Allow	Delete policy or amend Policy WH.P31 to exclude ancillary rural earthworks and introduce the following definition for ancillary rural earthworks: "Earthworks associated with normal agricultural and horticultural practices, such as: Maintenance and construction of facilities, devices and structures typically associated with farming activities including but not limited to farm tracks, driveways and unsealed parking areas, stock races, silage pits, farm drains, farm effluent ponds, and feeding lots, fencing, crop protection and sediment control measures Irrigation and land drainage The burying of material infected by unwated organisms as declared by the Ministry of Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993".	Accept
	Hutt City Council	FS16.092	Woodridge Holdings Ltd	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Not stated	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.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.	Allow	Delete policy and make earthworks great than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	Hutt City Council	FS23.363	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose all submission points seeking to amend proposed 2040 E.coli target timeframe to 2060.	Reject
	Hutt City Council	FS36.057	Wellington City Council	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Consistent with Wellington City Council's position on the matter.	Allow	Not stated	Accept
	Hutt City Council	FS48.017	Ministry of Housing and Urban	8 Whaitua Te	Policy WH.P31: Winter shut		Support	Concerned policy reads more like a rule or standard rather than outlining how an objective will be implemented. Consider that a blanket exclusion to	Allow	Delete Policy	Accept

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			Development (HUD)	Whanganui-a-Tara	down of earthworks.			winter earthworks is too blunt an approach that will impose significant costs to developments. An effects management approach that can consider the likely risk of the site (such as topography, slope, soil type, scale and duration of the work) is more appropriate. High rainfall events can occur at any time of year and a blanket ban of winter earthworks does not recognise or manage this.			
	Hutt City Council	FS47.185	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S211.017 by deleting Policy WH.P31.	Accept
S211.023	Hutt City Council (S211)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		Seeks that road maintenance be excluded from earthworks in the rule, noting that activities such as road resealing would otherwise unnecessarily require resource consent. Considers that the use of "and" means that earthworks of any scale would require resource consent under Rule WH.R24 unless associated with an erosion risk treatment plan or farm environment plan.	Amend Rule WH.23 as follows: Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note: this rule excludes repair or maintenance of existing roads, or repair, sealing or resealing of a road, footpath or driveway.		Reject
	Hutt City Council	FS20.052	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Transpower considers that the exclusion would appropriately enable maintenance and repair of roads, footpaths, or driveways that provide access to regionally significant infrastructure (including the National Grid).	Allow	Transpower supports the request to add the following exclusion to earthworks rule WH.R23: "Note: this rule excludes repair or maintenance of existing roads, or repair, sealing or	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										resealing of a road, footpath or driveway."	
	Hutt City Council	FS23.369	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose all submission points seeking to amend proposed 2040 E.coli target timeframe to 2060.	Accept
	Hutt City Council	FS28.004	Waka Kotahi NZ Transport Agency	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Changes proposed will improve clarity of the provisions.	Allow	Not stated	Reject
S211.024	Hutt City Council (S211)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		Disagrees with the s32 evaluation, which states that there is higher risk of sediment discharge during the winter period (June-September). Considers large storm events can occur throughout the year, resulting in large sediment discharges. Considers that earthworks during the winter period may be appropriate when there is a poor summer earthworks period due to adverse weather. Considers a BAU approach for winter earthworks should be maintained as a standard condition of consent as a discretionary activity which would allow GW to provide permits to undertake earthworks within this period as appropriate and subject to conditions.	Amend Rule WH.R24 as follows: Rule WH.R24: Earthworks – restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year		Reject
	Hutt City Council	FS16.145	Woodridge Holdings Ltd	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Not stated	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".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. 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.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.Shutting down all work during this period would significantly increase the costs and is impractical for	Allow	Remove (b) from WH.R24 and delete WH.R25 so that earthworks are not a non-complying activity.	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								large of projects including large infrastructure projects that take years to complete.			
	Hutt City Council	FS22.047	Cannon Point Development Limited (Ltd.)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support in part	Support in part because whilst Cannon Point Development Ltd.'s submission seeks deletion of clause (b), it also seeks the deletion of mater of discretion (8) and considers deletion of both parts are required to adequately address its concerns.	Allow in part	Support the relief sought to delete clause (b). Support reasoning that the BAU approach for winter earthworks should be maintained as a standard condition of consent as a discretionary activity which would allow GW to provide permits to undertake earthworks within this period as appropriate and subject to conditions.	Reject
	Hutt City Council	FS23.370	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose all submission points seeking to amend proposed 2040 E.coli target timeframe to 2060.	Accept
	Hutt City Council	FS47.276	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S211.024 and delete related discretionary matter (8).	Accept
S213.001	Pareraho Forest Trust (S213)			2 Interpretation	Earthworks	Support		Supports definition, specifically capturing all land disturbance activities with risk of significant sediment loss to water.	Retain as notified		Accept
S213.024	Pareraho Forest Trust (S213)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Amend		Notes greenfield development earthworks decrease visual clarity downstream more than the proposed standard and through the winter period. Seeks stronger and more transparent regulation of sediment discharges. Notes sediment pollution is highly visible and is an interest to catchment groups. Requests (c) amended to require WRC to publish monitoring results and advise community catchment groups of where the results can be found.	Add wording requiring monitoring results are published and community catchment groups are informed where to view them.		Reject
S219.012	Cuttriss Consultants Ltd (S219)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose		Opposes the requirement for non-complying resource consent to undertake winter earthworks. Notes that as high rainfall events can occur during any time of the year, and during summer months when the ground is less permeable, it is just as likely that sediment control measures will fail. In some soil conditions (i.e. sand, river gravels) it is preferable works occur when the ground is wet because it reduces the potential for sediment to be blown into waterways. considers the s32 report fails to justify why this measure is required. Considers the current method of site-specific assessments during winter works in achieving the objectives of the NPS-FW.	Delete policy and related rules.  Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).		Accept
	Cuttriss Consultants Ltd	FS8.007	Winstone Aggregates	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Winstone support the proposed exclusion of resurfacing that does not alter existing stormwater flows. This would partially resolve some of the concerns raised in Winstone's original Submission Point S206.028.	Allow	Winstone seek that relief sought is allow and Policy WH.P31 is deleted.	Accept
	Cuttriss Consultants Ltd	FS16.093	Woodridge Holdings Ltd	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Not stated	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. Shutting down all work	Allow	Delete policy and make earthworks great than 3,000m2 between 1 June and 30	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								during this period would significantly increase the costs and is impractical for large of projects including large infrastructure projects that take years to complete.		September a Discretionary Activity.	
	Cuttriss Consultants Ltd	FS13.074	Land Matters Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Not all sites need to be shut down over the winter; and not all effects on sediment discharge occur over this period, as noted by this submitter. This is not the most appropriate method for managing these effects.	Allow	Delete the policy and related rules regarding winter shut down of earthworks.	Accept
	Cuttriss Consultants Ltd	FS34.029	Orogen Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Refer to Orogen submission S239.004, S239.011, S239.012 & S239.019. A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approach to earthworks provides a better outcome for industry and compliance.	Allow	Delete policy and amend associated rules.	Accept
	Cuttriss Consultants Ltd	FS38.023	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	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. 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.	Allow	Delete policy and make earthworks great than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	Cuttriss Consultants Ltd	FS47.187	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S219.012 by deleting Policy WH.P31.	Accept
S219.020	Cuttriss Consultants Ltd (S219)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		Opposes the requirement for non-complying resource consent to undertake winter earthworks. Notes that as high rainfall events can occur during any time of the year, and during summer months when the ground is less permeable, it is just as likely that sediment control measures will fail. In some soil conditions (i.e. sand, river gravels) it is preferable works occur when the ground is wet because it reduces the potential for sediment to be blown into waterways. considers the s32 report fails to justify why this measure is required. Considers the current method of site-specific assessments during winter works in achieving the objectives of the NPS-FW.	Amend rule to as follows. Rule WH.R24: Earthworks – restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year.		Reject
	Cuttriss Consultants Ltd	FS16.146	Woodridge Holdings Ltd	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted		Not stated	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	Allow	Remove (b) from WH.R24 and delete WH.R25 so that earthworks are not a non-complying activity.	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					discretionary activity.			should be treated on its merits and conditioned accordingly, and one of the matters for discretion is the "timing of the works". 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. 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. 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. 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.			
	Cuttriss Consultants Ltd	FS13.075	Land Matters Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Not all sites need to be shut down over the winter; and not all effects on sediment discharge occur over this period, as noted by this submitter. This is not the most appropriate method for managing these effects.	Allow	Delete the policy and related rules regarding winter shut down of earthworks.	Reject
	Cuttriss Consultants Ltd	FS34.032	Orogen Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Refer to Orogen submission S239.004, S239.011, S239.012 & S239.019. A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approach to earthworks provides a better outcome for industry and compliance.	Allow	Delete policy and amend associated rules.	Accept in part
	Cuttriss Consultants Ltd	FS47.278	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S219.020 and delete related discretionary matter (8).	Accept
S219.025	Cuttriss Consultants Ltd (S219)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose		Opposes the requirement for non-complying resource consent to undertake winter earthworks. Notes that as high rainfall events can occur during any time of the year, and during summer months when the ground is less permeable, it is just as likely that sediment control measures will fail. In some soil conditions (i.e. sand, river gravels) it is preferable works occur when the ground is wet because it reduces the potential for sediment to be blown into waterways. Considers the s32 report fails to justify why this measure is required. Considers the current method of site-specific assessments during winter works in achieving the objectives of the NPS-FW.	Delete policy and related rules. Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).		Accept
	Cuttriss Consultants Ltd	FS16.175	Woodridge Holdings Ltd	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Not stated	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. 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.	Allow	Delete policy and make earthworks greater than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	Cuttriss Consultants Ltd	FS13.076	Land Matters Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Not all sites need to be shut down over the winter; and not all effects on sediment discharge occur over this period, as noted by this submitter. This is not the most appropriate method for managing these effects.	Allow	Delete the policy and related rules regarding winter shut down of earthworks.	Accept



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Cuttriss Consultants Ltd	FS34.031	Orogen Limited	9 Te Awarua-o-Porirua Waitua	Policy P.P29: Winter shut down of earthworks.		Support	Refer to Orogen submission S239.004, S239.011, S239.012 & S239.019. A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approach to earthworks provides a better outcome for industry and compliance.	Allow	Delete policy and amend associated rules.	Accept
	Cuttriss Consultants Ltd	FS47.335	Meridian Energy Limited	9 Te Awarua-o-Porirua Waitua	Policy P.P29: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S219.025.	Accept
S219.031	Cuttriss Consultants Ltd (S219)			9 Te Awarua-o-Porirua Waitua	Rule P.R23: Earthworks – restricted discretionary activity.	Amend		Submitter refers to feedback provided on Rule WH.P23 (note no feedback was provided on rule WH.P23 within the submission).	Submitter refers to proposed amendment to Policy WH.R23 (that no amendment was provided for policy WH.P23 within the submission)		Reject
	Cuttriss Consultants Ltd	FS16.231	Woodridge Holdings Ltd	9 Te Awarua-o-Porirua Waitua	Rule P.R23: Earthworks – restricted discretionary activity.		Not stated	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". 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. 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. 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 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.	Allow	Remove (b) from P.R23 and delete WH.R24 so that earthworks are a Discretionary Activity.	Reject
	Cuttriss Consultants Ltd	FS13.077	Land Matters Limited	9 Te Awarua-o-Porirua Waitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Not all sites need to be shut down over the winter; and not all effects on sediment discharge occur over this period, as noted by this submitter. This is not the most appropriate method for managing these effects.	Allow	Delete the policy and related rules regarding winter shut down of earthworks.	Reject
	Cuttriss Consultants Ltd	FS34.030	Orogen Limited	9 Te Awarua-o-Porirua Waitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Refer to Orogen submission S239.004, S239.011, S239.012 & S239.019. A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approach to earthworks provides a better outcome for industry and compliance.	Allow	Delete policy and amend associated rules.	Reject
	Cuttriss Consultants Ltd	FS47.416	Meridian Energy Limited	9 Te Awarua-o-Porirua Waitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S219.031 and delete clause (b) and related discretionary matter (8).	Reject
S220.002	Rosco Ice Cream Ltd (S220)			2 Interpretation	Earthworks	Oppose		Opposes the definition of "earthworks" that relates to the Te Whanganui-a-Tara and Te Awarua-o-Porirua Waitua as the definition removes all reasonable exceptions from the current definition and only excludes gardening, cultivation and post holes.	Retain the original definition of earthworks for all waitua.		Reject
	Rosco Ice Cream Ltd	FS47.107	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment	Allow	Allow S220.002.	Reject

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								and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;			
S220.017	Rosco Ice Cream Ltd (S220)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Oppose		Opposes the restrictions that no sediment can be discharged from a site during earthworks. Notes it is common practice to utilise erosion and sediment control measures during an earthworks operation, but it would be near impossible to guarantee that site development could prevent any and all discharges of sediment from the site in all weather events.	Apply a more pragmatic measure for the limit of sediment that can be discharged. Either cross reference to the permitted standards under rule WH.R3; or use some other practical measurement of the amount of sediment in stormwater runoff.		Accept in part
S220.018	Rosco Ice Cream Ltd (S220)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		Considers that this rule should include a non-notification clause.	Amend Rule WH.R24 to include a non-notification clause.		Reject
S222.002	Environmental Defence Society Inc. (S222)			2 Interpretation	Earthworks	Amend		Refers to outdated regulations.	Refer to updated regulations - NES-CF.		Accept
	Environmental Defence Society Inc.	FS9.183	New Zealand Farm Forestry Association (NZFFA)	2 Interpretation	Earthworks		Oppose	Not stated	Disallow	Not stated	Reject
	Environmental Defence Society Inc.	FS23.158	Forest & Bird	2 Interpretation	Earthworks		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
	Environmental Defence Society Inc.	FS27.894	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	2 Interpretation	Earthworks		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly,	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
	Environmental Defence Society Inc.	FS50.041	New Zealand Carbon Farming Group ('NZCF')	2 Interpretation	Earthworks		Oppose	NZCF acknowledges the intent of the submission but considers that merely replacing references to the NESPF with reference to the NESCF is not sufficient. It is NZCF's view that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	Disallow	Not stated	Reject
S222.049	Environmental Defence Society Inc. (S222)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Amend		To give effect to NPSFM.	Require setbacks.		reject
	Environmental Defence Society Inc.	FS25.066	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Oppose	The need to require setback distances is not required in the NRP as the NES-FM and NES-CF already addresses this matter	Disallow	Retain the wording of Policy WH.P29 as notified	Accept in part
	Environmental Defence Society Inc.	FS9.230	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Oppose	Not stated	Disallow	Not stated	Accept in part
	Environmental Defence Society Inc.	FS23.205	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
	Environmental Defence Society Inc.	FS27.941	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S222.050	Environmental Defence Society Inc. (S222)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Support		To give effect to NPSFM.	Not stated		Reject
	Environmental Defence Society Inc.	FS9.231	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Oppose	Not stated	Disallow	Not stated	Reject
	Environmental Defence Society Inc.	FS23.206	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
	Environmental Defence Society Inc.	FS27.942	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly,	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
	Environmental Defence Society Inc.	FS28.052	Waka Kotahi NZ Transport Agency	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Oppose	Relief lacks specificity to assess impact.	Disallow	Not stated	Accept
S222.063	Environmental Defence Society Inc. (S222)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		To give effect to NPSFM and comply with RMA.	Considers greater setback from waterbodies and coastal marine area is required. Also need to clarify interaction of rule with NES-PF/CF.		Reject
	Environmental Defence Society Inc.	FS8.018	Winstone Aggregates	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose	Winstone oppose increasing the setback. The setback provided in the notified rule is consistent with the setback for earthworks provided for in the operative NRP. It is unclear what setback is requested by the submitter, and what justification there is for any increased setback.	Disallow	Winstone seek that relief sought is not allowed.	Accept
	Environmental Defence Society Inc.	FS25.068	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose in part	The greater setback sought by the submitter is already addressed in the NES-FM and the NES-CF and is not required in the NRP and are not necessary to implement the NPS-FM or to achieve the purpose of the RMA	Disallow in part	Retain the wording of Rule WH.R23 as notified	Accept in part
	Environmental Defence Society Inc.	FS9.244	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose	Not stated	Disallow	Not stated	Accept
	Environmental Defence Society Inc.	FS20.009	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose in part	The setback provided in the notified rule is consistent with the setback for earthworks provided for in the operative NRP. It is unclear what setback is requested by the submitter, and what justification there is for any increased setback.	Disallow in part	Transpower opposes the request to increase the setback of earthworks from waterbodies and the coastal marine area under rule WH.R23.	Accept
	Environmental Defence Society Inc.	FS23.219	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
	Environmental Defence Society Inc.	FS27.955	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
	Environmental Defence Society Inc.	FS28.054	Waka Kotahi NZ Transport Agency	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose	Relief lacks specificity to assess impact.	Disallow	Not stated	Accept
	Environmental Defence Society Inc.	FS45.023	Kāinga Ora – Homes and Communities	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose	Kāinga Ora opposes the relief sought in relation to greater setbacks.	Disallow	Considers greater setback from waterbodies and coastal marine area is required. Also need to clarify interaction of rule with NES-PF/CF.	Accept
S222.064	Environmental Defence Society Inc. (S222)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		To give effect to NPSFM and comply with RMA.	Make a discretionary activity. Also need to clarify interaction of rule with NES-PF/CF.		Reject
	Environmental Defence Society Inc.	FS25.069	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose in part	The need to reclassify the activity status to discretionary is not necessary as the matters of discretion are robust and appropriate and will ensure the implementation of the NPS-FM and the purpose of the RMA is achieved	Disallow in part	Retain restricted discretionary activity status of Rule WH.R24 as notified	Accept
	Environmental Defence Society Inc.	FS9.245	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	Not stated	Disallow	Not stated	Accept
	Environmental Defence Society Inc.	FS20.010	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose in part	Subject to the decision requested by Transpower in its submission on rule WH.R24 being allowed, Transpower considers that the matters of discretion recognise an appropriate range of potential adverse effects associated with earthworks. On this basis, Transpower considers that discretionary activity status is unjustified.	Disallow in part	Transpower opposes the request to change the activity status of earthworks rule WH.R24 from restricted discretionary to discretionary.	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Environmental Defence Society Inc.	FS23.220	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
	Environmental Defence Society Inc.	FS27.956	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part
	Environmental Defence Society Inc.	FS28.056	Waka Kotahi NZ Transport Agency	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	Earthworks effects and mitigation are well understood and are appropriate to address as a restricted discretionary activity.	Disallow	Not stated	Accept
	Environmental Defence Society Inc.	FS45.024	Kāinga Ora – Homes and Communities	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	Kāinga Ora opposes the relief sought to make the rule a Discretionary activity.	Disallow	Make a discretionary activity. Also need to clarify interaction of rule with NES-PF/CF.	Accept
	Environmental Defence Society Inc.	FS47.279	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	Restricted discretionary activity status provides sufficient rigour to address likely environmental effects;	Disallow	Disallow S222.064.	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S222.065	Environmental Defence Society Inc. (S222)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.	Support		Gives effect to NPSFM.	Not stated		Reject
	Environmental Defence Society Inc.	FS9.246	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Oppose	Not stated	Disallow	Not stated	Accept
	Environmental Defence Society Inc.	FS23.221	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
	Environmental Defence Society Inc.	FS27.957	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part
S222.092	Environmental Defence Society Inc. (S222)			9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Amend		To give effect to NPSFM.	Require setbacks		Reject



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Environmental Defence Society Inc.	FS9.273	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.		Oppose	Not stated	Disallow	Not stated	Accept
	Environmental Defence Society Inc.	FS23.248	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
	Environmental Defence Society Inc.	FS27.984	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part
	Environmental Defence Society Inc.	FS28.053	Waka Kotahi NZ Transport Agency	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.		Oppose	Relief lacks specificity to assess impact.	Disallow	Not stated	Accept
S222.093	Environmental Defence Society Inc. (S222)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Support		Gives effect to NPSFM.	Not stated		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Environmental Defence Society Inc.	FS9.274	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Oppose	Not stated	Disallow	Not stated	Accept
	Environmental Defence Society Inc.	FS23.249	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
	Environmental Defence Society Inc.	FS27.985	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Reject
S222.105	Environmental Defence Society Inc. (S222)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Amend		To give effect to NPSFM and comply with RMA.	Considers a greater setback from waterbodies and the coastal marine area is required. Also need to clarify interaction of rule with NES-PF/CF.		Reject
	Environmental Defence Society Inc.	FS9.286	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Oppose	Not stated	Disallow	Not stated	Accept
	Environmental Defence Society Inc.	FS20.016	Transpower New Zealand Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Oppose in part	The setback provided in the notified rule is consistent with the setback for earthworks provided for in the operative NRP. It is unclear what setback is requested by the submitter, and what justification there is for any increased setback.	Disallow in part	Transpower opposes the request to increase the setback of earthworks from waterbodies and the	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										coastal marine area under rule P.R22.	
	Environmental Defence Society Inc.	FS23.261	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
	Environmental Defence Society Inc.	FS27.997	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part
	Environmental Defence Society Inc.	FS28.055	Waka Kotahi NZ Transport Agency	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Oppose	Relief lacks specificity to assess impact.	Disallow	Not stated	Accept
S222.106	Environmental Defence Society Inc. (S222)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Amend		To give effect to NPSFM and comply with RMA.	Make a discretionary activity.  Clarify the interaction of rule with NES-PF/CF.		Reject
	Environmental Defence Society Inc.	FS9.287	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Oppose	Not stated	Disallow	Not stated	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Environmental Defence Society Inc.	FS20.017	Transpower New Zealand Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Oppose in part	Subject to the decision requested by Transpower in its submission on rule WH.R24 being allowed, Transpower considers that the matters of discretion recognise an appropriate range of potential adverse effects associated with earthworks. On this basis, Transpower considers that discretionary activity status is unjustified.	Disallow in part	Transpower opposes the request to change the activity status of earthworks rule P.R23 from restricted discretionary to discretionary.	Accept
	Environmental Defence Society Inc.	FS23.262	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
	Environmental Defence Society Inc.	FS27.998	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part
	Environmental Defence Society Inc.	FS47.417	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Oppose	Restricted discretionary activity status provides sufficient rigour to address likely environmental effects;	Disallow	Disallow S222.106.	Accept
S222.107	Environmental Defence Society Inc. (S222)			9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.	Support		Gives effect to NPSFM.	Not stated		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Environmental Defence Society Inc.	FS9.288	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Oppose	Not stated	Disallow	Not stated	Accept
	Environmental Defence Society Inc.	FS23.263	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Support	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Reject
	Environmental Defence Society Inc.	FS27.999	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part
S225.016	Upper Hutt City Council (S225)			General comments	General comments - earthworks	Amend		Considers this removal will result in significant issues for territorial authorities and landowners carrying out everyday activities, with no scale included in any provisions and no rules addressing this issue.	Amend and reintroduce exclusions for "repair, sealing or resealing of a road, footpath, driveway" from definition of earthworks.		Reject
	Upper Hutt City Council	FS23.844	Forest & Bird	General comments	General comments - earthworks		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S225.032	Upper Hutt City Council (S225)			2 Interpretation	Earthworks	Oppose		Concerns with amended definition of earthworks. Considers definition incorrectly implements national planning standards, through having “except that for the purposes of”. Consider removal of other exclusions (e.g. the ‘repair and maintenance of existing roads, footpaths, driveways’ etc.) is fundamentally unreasonable and an issue of impracticality and cost for ongoing functions of submitter – particularly in relation to business as usual road maintenance and repair activities.	Seek amendments to correctly apply national planning standards or reintroduce all exclusions.		Reject
	Upper Hutt City Council	FS1.008	Horticulture New Zealand	2 Interpretation	Earthworks		Support	It is unreasonable to remove exclusions for business-as-usual horticultural activities.	Allow	Reintroduce the exclusions for “the harvesting of crops” and “maintenance of orchards and shelterbelts”.	Reject
	Upper Hutt City Council	FS11.013	GILLIES GROUP MANAGEMENT LTD	2 Interpretation	Earthworks		Support	Agrees with the amendments sought to the definition of earthworks to reintroduce the exclusions.	Allow	Support submission point in full	Reject
	Upper Hutt City Council	FS30.013	Pukerua Holdings Limited	2 Interpretation	Earthworks		Support	Agrees with the amendments sought to the definition of earthworks to reintroduce the exclusions.	Allow	Support submission point in full	Reject
	Upper Hutt City Council	FS23.860	Forest & Bird	2 Interpretation	Earthworks		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird’s submission points and specific relief.	Reject
	Upper Hutt City Council	FS47.108	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow S225.032.	Reject
S225.042	Upper Hutt City Council (S225)			2 Interpretation	Stabilisation	Support		Not stated	Retain as notified		Accept
	Upper Hutt City Council	FS23.870	Forest & Bird	2 Interpretation	Stabilisation		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird’s submission points and specific relief.	Reject
S225.091	Upper Hutt City Council (S225)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Amend		Considers these are all reasonable things to include as conditions of consents for larger projects, but may not be reasonable for small scale projects such as the maintenance of driveways and footpaths, which are now considered earthworks, in accordance with amended definition.	Amend to clearly identify scale or threshold this policy should apply at.		Reject
	Upper Hutt City Council	FS23.919	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird’s submission	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										points and specific relief.	
	Upper Hutt City Council	FS36.045	Wellington City Council	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Support	Consistent with Wellington City Council's position on the matter.	Allow	Not stated	Reject
S225.092	Upper Hutt City Council (S225)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Oppose		Concerned policy reads more like a rule or standard rather than outlining how an objective will be implemented.	Delete policy or amend to be a policy rather than a rule or standard.		Reject
	Upper Hutt City Council	FS16.090	Woodridge Holdings Ltd	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Not stated	This policy is written in the form of a rule or standard rather than outlining how an objective will be implemented.	Allow	Delete policy or amend to be a policy rather than a rule or standard	Reject
	Upper Hutt City Council	FS23.920	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S225.093	Upper Hutt City Council (S225)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose		Concerned policy reads more like a rule or standard rather than outlining how an objective will be implemented.	Delete policy or amend to be a policy rather than a rule or standard.		Accept
	Upper Hutt City Council	FS11.020	GILLIES GROUP MANAGEMENT LTD	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Agrees with the request to delete Policy WH.P31 relating to winter works.	Allow	Support submission point in full	Accept
	Upper Hutt City Council	FS16.094	Woodridge Holdings Ltd	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Not stated	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. 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.	Allow	Delete policy and make earthworks great than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	Upper Hutt City Council	FS30.020	Pukerua Holdings Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Agrees with the request to delete Policy WH.P31 relating to winter works.	Allow	Support submission point in full	Accept
	Upper Hutt City Council	FS23.921	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Upper Hutt City Council	FS48.018	Ministry of Housing and Urban Development (HUD)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Concerned policy reads more like a rule or standard rather than outlining how an objective will be implemented. Consider that a blanket exclusion to winter earthworks is too blunt an approach that will impose significant costs to developments. An effects management approach that can consider the likely risk of the site (such as topography, slope, soil type,	Allow	Delete policy or amend to be a policy rather than a rule or standard.	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								scale and duration of the work) is more appropriate. High rainfall events can occur at any time of year and a blanket ban of winter earthworks does not recognise or manage this.			
	Upper Hutt City Council	FS47.188	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Oppose in part	Meridian opposes the provision as either a policy or a standard or rule;	Disallow in part	Allow S225.093 by deleting Policy WH.P31.	Accept
S225.107	Upper Hutt City Council (S225)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Oppose		Concerns with implications of amending earthworks definition, and implications for this rule. Considers clause 16 changes to the provision significantly improve outcomes for landowners and public, but submitter remains of the opinion the removal of exclusions from definitions of earthworks, significantly affect submitters ability to undertake business as usual maintenance and renewals particularly for local authority roads, footpaths and cycle paths. Considers it more appropriate to include these activities as permitted activities, given their effects are well understood, and can be managed by permitted activity standards.	Amend provisions to address the following key functions of territorial authorities as road controlling authorities: 1. need to cover road maintenance and upgrading, including reseal 2. upgrading of underground networks 3. replacement of signs and traffic/speed management 4. repair, maintenance and upgrading of pedestrian and cycle facilities  Seek that and/or used throughout this document be amended to clarify whether it is inclusive or not as and/or is inappropriate.		Accept in part
	Upper Hutt City Council	FS23.935	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Upper Hutt City Council	FS36.048	Wellington City Council	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Consistent with Wellington City Council's position on the matter.	Allow	Not stated	Accept
S225.108	Upper Hutt City Council (S225)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Oppose		Concerns with application of amended earthworks definition and implications for this rule. Concerns resource consent would be required for every 150 linear metres of road, based on an average 20 m road width. Scale at which resource consents would apply for every territorial authority in the region, would be an extremely onerous. Considers amended permitted activity standards are a far more appropriate way to manage sediment run-off concerns.	Amend suite of provisions to address and reflect the requirements and functions of territorial authorities as road controlling authorities, which appropriate permitted activity standards to manage effects.  Seek that and/or used throughout this document be amended to clarify whether it is inclusive or not as and/or is inappropriate.		Accept
	Upper Hutt City Council	FS23.936	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S225.109	Upper Hutt City Council (S225)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.	Amend		Submitter refers to other rules which default into this non-complying rule.	Seek rule is reviewed and any consequential amendments made in relation to concerns raised in submission, in respect of other inter-related provisions.		Accept



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	Upper Hutt City Council	FS23.937	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S238.018	Greater Wellington Regional Council (S238)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		Notes Rule WH.R23 should apply to all earthworks.	Amend as follows: Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, or (ca) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (ib) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken ..., and (iic) soil or debris from earthworks is not placed..., and (iiid) the area of earthworks must be stabilised ..., and (ive) there is no discharge of sediment ..., and (vf) erosion and sediment control... .		Accept
	Greater Wellington Regional Council	FS1.050	Horticulture New Zealand	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Ancillary rural earthworks should be a permitted activity.	Allow	Delete (a) and (b) such that Rule WH.R23 applies to all earthworks, including ancillary rural earthworks.	Accept
	Greater Wellington Regional Council	FS22.041	Cannon Point Development Limited (Ltd.)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Support as it provides for the relief sought by Cannon Point Development Ltd.	Allow	Supports the proposed amendment to provide that Rule WH.R23 should apply to all Earthworks.	Accept
	Greater Wellington Regional Council	FS23.321	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Submission points will help clarify plan provisions.	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Accept
S238.030	Greater Wellington Regional Council (S238)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Amend		Notes Rule WH.R23 applies to all earthworks.	Amend as follows: Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, or (ca) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									(ib) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken ..., and (iic) soil or debris from earthworks is not placed..., and (iiid) the area of earthworks must be stabilised ..., and (ive) there is no discharge of sediment ..., and (vf) erosion and sediment control...		
	Greater Wellington Regional Council	FS1.073	Horticulture New Zealand	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Ancillary rural earthworks should be a permitted activity.	Allow	Delete (a) and (b) such that Rule WH.R23 applies to all earthworks, including ancillary rural earthworks.	Accept
	Greater Wellington Regional Council	FS23.333	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Submission points will help clarify plan provisions.	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Accept
	Greater Wellington Regional Council	FS47.397	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Oppose in part	Meridian opposes the inclusion of clause (g) in GWRC's requested amendments;	Disallow in part	Disallow S238.030 in part by deleting clause (g) (re-numbered ( e ) in S238.030).	Reject
S239.003	Orogen Limited (S239)			2 Interpretation	Earthworks	Amend		Concerned the definition removes the former exclusions that apply in all other whaitua, which are typically low-risk activities that required limited disturbance in comparison with earthwork activities that were not previously excluded. Considers including these former exclusions under the broad definition of 'earthworks' overstates the associated risk and will hamper development in the region. Notes that excluded activities may then have their own set of rules to manage their effects appropriately and acknowledge their lower risk.	Amend the definition of 'earthworks': The alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes: gardening, cultivation, and disturbance of land for the installation of fence posts (a) cultivation of the soil for the establishment of crops or pasture, and (b) the harvesting of crops, and (c) thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and (d) the construction, repair, upgrade or maintenance of: (i) pipelines, and (ii) electricity lines and their support structures, including the National Grid, and (iii) telecommunication structures or lines, and (iv) radio communication structures, and (v) firebreaks or fence lines, and (vi) a bore or geotechnical investigation bore, and (e) repair or maintenance of existing roads and tracks, and airfield runways, taxiways, and parking aprons for aircraft, and (f) maintenance of orchards and shelterbelts, and (g) domestic gardening, and (h) repair, sealing or resealing of a		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									<p>road, footpath, driveway, and (i) discharge of cleanfill material to a cleanfill area</p> <p>Except that, for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20, 'earthworks' has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.</p> <p>Create a new definition and associated set of rules for the excluded activities, including:</p> <p>(a) cultivation of the soil for the establishment of crops or pasture, and</p> <p>(b) the harvesting of crops, and</p> <p>(c) thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and</p> <p>(d) the construction, repair, upgrade or maintenance of:</p> <p>(i) pipelines, and</p> <p>(ii) electricity lines and their support structures, including the National Grid, and</p> <p>(iii) telecommunication structures or lines, and</p> <p>(iv) radio communication structures, and</p> <p>(v) firebreaks or fence lines, and</p> <p>(vi) a bore or geotechnical investigation bore, and</p> <p>(j) repair or maintenance of existing roads and tracks, and airfield runways, taxiways, and parking aprons for aircraft, and</p> <p>(k) maintenance of orchards and shelterbelts, and</p> <p>(l) domestic gardening, and</p> <p>(m) repair, sealing or resealing of a road, footpath, driveway, and</p> <p>(n) discharge of cleanfill material to a cleanfill area</p>		
	Orogen Limited	FS16.044	Woodridge Holdings Ltd	2 Interpretation	Earthworks		Not stated	The cost and time implications of the "Earthworks" definition do not appear to have been thought through or considered in the s32 analysis.	Allow	<p>Provide one definition for earthworks for the region.</p> <p>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.</p>	Reject
	Orogen Limited	FS32.026	PCL Contracting Ltd as part of CCNZ	2 Interpretation	Earthworks		Support	Concerned that by limiting greenfield development to set areas prevents larger development when existing controls deal with SW runoff and treatment to a high level. Proposed rules are too inflexible and don't encourage site specific requirements that are	Allow	Concerned the definition removes the former exclusions that apply in all other whaitua, which are	Accept in part

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								encountered with the multitude of different soil types, Rule needs to be more flexible to involve a collaborative approach to manage runoff. This inflexibility will add significant cost to consenting and compliance process which contradicts Government overarching desire to reduce cost to housing and development and create more affordable housing. The cost to meet the requirements will inevitably create a lot of non-compliant runoff as the level being asked is to treat SW runoff to a point it is at the level of drinking water and is not practical and will put undue risk onto businesses that they would have to mitigate by increasing pricing to employ scientists to sample and test on continuous sites. This cost when working on Local body works then is passed onto the ratepayers and if rates aren't increased then less work can be done for the same dollar spend which effectively puts pressure on the infrastructure that is already at breaking point		typically low-risk activities that required limited disturbance in comparison with earthwork activities that were not previously excluded. Considers including these former exclusions under the broad definition of 'earthworks' overstates the associated risk and will hamper development in the region. Notes that excluded activities may then have their own set of rules to manage their effects appropriately and acknowledge their lower risk.	
	Orogen Limited	FS47.109	Meridian Energy Limited	2 Interpretation	Earthworks		Support in part	The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow in part	Allow S239.003 in part by reinstating exclusions (a) to (i).	Reject
	Orogen Limited	FS10.18	Enviro NZ Services Ltd (Enviro NZ)	2 Interpretation	Earthworks		Support	Proposed exclusions are appropriate	Allow	All additions	Reject
S239.004	Orogen Limited (S239)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Amend		Does not support earthworks during the period 1st June to 30th September being a non-complying activity, however acknowledges that seasonal variations in rainfall and groundwater should be taken into consideration.	Earthworks over 3,000m2 in area shall: (a) be shut down require erosion and sediment controls appropriate for seasonal variations in rainfall and groundwater from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).		Accept
	Orogen Limited	FS16.095	Woodridge Holdings Ltd	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Not stated	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. 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.	Allow	Delete policy and make earthworks greater than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	Orogen Limited	FS32.027	PCL Contracting Ltd as part of CCNZ	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	This does not take into account local conditions like Kapiti where working in sand is better to be done in winter where moisture in the sand helps with compaction and dust control. Areas in winter months 1 June to 31 September quite often have less rainfall than in the spring months from 1 October to 31st December where traditionally the Wellington region suffers from large storm events and risk of runoff from	Allow	Does not support earthworks during the period 1st June to 30th September being a non-complying activity, however acknowledges that seasonal variations in rainfall	Accept

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								sediment is far worse. We recommend that winter work still be available and all parties work collaboratively ( as we currently do ) to mitigate the risk through the same controls that are in place currently and during the other 8 months of the year. Limiting areas permitted doesn't consider low risk areas like flat farmland where sediment pods and run-off is minimal and where stabilisation plans can be used to mitigate run-off effectively before any rainfall events. The one rule fits all scenario will reduce productivity by effectively 33% for businesses that require year- round work in earthworks and with trenching being brought into the earthworks umbrella, it now means that a lot of Civil companies may have to shut down for that period and become seasonal occupations. This then means workers and businesses will not be able to afford to operate in this country and infrastructure rebuilding works will slow to a point that the region as a whole will be crippled. This also prevents activities like clean fills opening and operating and they form a vital part of the region's ability to do any infrastructure work. By making it harder to pen and operate a clean fill, the companies have to look elsewhere to cart material which increases costs to all projects, emissions increase as trucks are having to travel further and more trucks are then required on the road creating more wear and tear on our infrastructure meaning the roads will have a shorter life		and groundwater should be taken into consideration.	
	Orogen Limited	FS38.024	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	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. 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.	Allow	Delete policy and make earthworks great than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	Orogen Limited	FS47.189	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Oppose in part	Meridian agrees earthworks during the winter period should not require consent as a non-complying activity but considers the policy should be deleted, not amended;	Disallow in part	Allow S239.004 in part by deleting Policy WH.P31.	Accept
S239.009	Orogen Limited (S239)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		Considers the discharge of sediment from earthworks is unavoidable even with the use of sediment controls. Cites the technical reports for PC1, which reference studies specifying that the sediment removal of all devices are less than 100% and sediment discharges continue to occur, albeit at lower rates, even when the earthworks area is stabilised. Considers no earthworks will meet the permitted activity criteria, regardless of size and treatment.	(iv) There is no discharge of runoff sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, that is not treated by erosion and sediment control measures, and (v) Erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.		Accept in part
	Orogen Limited	FS16.143	Woodridge Holdings Ltd	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Not stated	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	Allow	Amend to take into consideration these submissions including removal of the (iv) and the requirements that there no “no discharge of sediment from	Accept in part

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								lower rates, even when the earthworks area is stabilised. AS currently written no earthworks will meet the permitted activity criteria, regardless of size and treatment.		earthworks.”  Amend Items (c)(1v) and (c)(v) so that they allow an appropriate level of SS ion any stormwater discharge. 50g/m3 to Schedule A sites and 100g/m3 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).	
	Orogen Limited	FS32.032	PCL Contracting Ltd as part of CCNZ	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	This rule is designed for failure of compliance as it is too onerous to comply 100% of the time. The limits and requirements are to such a high standard that businesses will be unable to meet the requirements and face prosecution and fines. The risk is businesses refuse to continue and close their doors to avoid being fined and losing decades of hard work.	Allow	Considers the discharge of sediment from earthworks is unavoidable even with the use of sediment controls. Cites the technical reports for PC1, which reference studies specifying that the sediment removal of all devices are less than 100% and sediment discharges continue to occur, albeit at lower rates, even when the earthworks area is stabilised. Considers no earthworks will meet the permitted activity criteria, regardless of size and treatment.	Accept in part
	Orogen Limited	FS47.258	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support in part	Meridian agrees that clause (g) is impractical, unachievable and unreasonable and should be deleted;	Allow in part	Allow S239.009 by deleting clause (g).	Accept
S239.010	Orogen Limited (S239)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Oppose		Considers the proposed TSS limit of 100g/m3 is too restrictive, and is a significant reduction from the existing threshold of 170 NTU that is currently imposed on land use consents. Considers that the proposed TSS limit has not been informed by empirical data on sediment control device performance across the Wellington region, or sufficient scientific evidence. States that the technical publications for PC1 do not mention the TSS standard of 100g/m3 and considers there is a lack of connection between the technical reports on the receiving water bodies and the proposed discharge standard. Seeks for the discharge standard to be redrafted in accordance with the best information available, in accordance with Section 1.6 of the NPS-FM. Considers measuring turbidity (NTU) is a reliable proxy for TSS, noting the long testing period for TSS results. Considers the proposed discharge standard disincentivises the use of high efficiency sediment devices, while increasing compliance risks. Concerned that the GWRC Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021) does not provide sufficient	The submitter requests that the proposed total suspended solids limit is re-drafted to a meaningful threshold that achieves the outcomes sought. The submitter requests that provision is made for the use of NTU (nephelometric turbidity units) as an acceptable unit of measurement.		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								guidance to comply with the standard. Considers that the use of low efficiency devices will be encouraged, which will achieve compliance, however will decrease regional performance against target attribute states.			
	Orogen Limited	FS32.033	PCL Contracting Ltd as part of CCNZ	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Not stated	Allow	Considering the proposed TSS limit of 100g/m3 is too restrictive and is a significant reduction from the existing threshold of 170 NTU that is currently imposed on land use consents. Considers that the proposed TSS limit has not been informed by empirical data on sediment control device performance across the Wellington region, or sufficient scientific evidence. States that the technical publications for PC1 do not mention the TSS standard of 100g/m3 and considers there is a lack of connection between the technical reports on the receiving water bodies and the proposed discharge standard. Seeks for the discharge standard to be redrafted in accordance with the best information available, in accordance with Section 1.6 of the NPS-FM. Considers measuring turbidity (NTU) is a reliable proxy for TSS, noting the long testing period for TSS results. Considers the proposed discharge standard disincentivizes the use of high efficiency sediment devices, while increasing compliance risks. Concerned that the GWRC Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021) does not provide sufficient guidance to comply with the standard. Considers that the use of low efficiency	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										devices will be encouraged, which will achieve compliance, however will decrease regional performance against target attribute states.	
S239.011	Orogen Limited (S239)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Oppose		Concerned with the proposed non-complying activity status, stating that at the time that consent is applied for, information is not accurate enough to forecast site conditions during the "winter earthworks" period, particularly for larger earthworks which span over preceding non-winter months. Considers a non-complying activity status and requiring the supporting information at the consenting phase will mean the quality of the information provided is poor and will be reliant on assumptions including the size and location of earthworks, the type of construction activities, the performance of the proposed sediment control devices, seasonal variations in the local environment, and the applicant's resourcing capabilities. Seeks for the retention of existing mechanisms for the applications for winter works, allowing for higher quality information to be provided.	Delete (b). Insert earthworks activities during the winter period as a matter of discretion.		Reject
	Orogen Limited	FS16.147	Woodridge Holdings Ltd	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Not stated	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". 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. 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. 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. 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.	Allow	Remove (b) from WH.R24 and delete WH.R25 so that earthworks are not a non-complying activity.	Accept in part
	Orogen Limited	FS32.034	PCL Contracting Ltd as part of CCNZ	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Not stated	Allow	Concerned with the proposed non-complying activity status, stating that at the time that consent is applied for, information is not accurate enough to forecast site conditions during the "winter earthworks" period, particularly for larger earthworks which span over preceding non-winter months. Considers a non-complying activity status and requiring the supporting information	Accept in part



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										at the consenting phase will mean the quality of the information provided is poor and will be reliant on assumptions including the size and location of earthworks, the type of construction activities, the performance of the proposed sediment control devices, seasonal variations in the local environment, and the applicant's resourcing capabilities. Seeks for the retention of existing mechanisms for the applications for winter works, allowing for higher quality information to be provided.	
	Orogen Limited	FS47.280	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S239.011 and delete related discretionary matter (8).	Reject
S239.012	Orogen Limited (S239)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Amend		Does not support earthworks within the proposed winter period being a non-complying activity, however acknowledges that seasonal variations in rainfall and groundwater should be taken into consideration.	Earthworks over 3,000m2 in area shall: (a) be shut down require erosion and sediment controls appropriate for seasonal variations in rainfall and groundwater from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).		Accept
	Orogen Limited	FS32.035	PCL Contracting Ltd as part of CCNZ	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	One rule for all does will not create a successful environmental plan and consideration must be taken into account of the site, ground material, and proposed mitigation.	Allow	Does not support earthworks within the proposed winter period being a non-complying activity, however, acknowledges that seasonal variations in rainfall and groundwater should be taken into consideration.	Accept
	Orogen Limited	FS47.336	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Oppose in part	Meridian agrees earthworks during the winter period should not require consent as a non-complying activity but considers the policy should be deleted, not amended;	Disallow in part	Allow S239.012 in part by deleting Policy WH.P31.	Accept
S239.017	Orogen Limited (S239)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Oppose		Considers the discharge of sediment from earthworks is unavoidable even with the use of sediment controls. Cites the technical reports for PC1, which reference studies specifying that the sediment removal of all devices are less than 100% and sediment discharges continue to occur, albeit at lower rates, even when the	(iv) There is no discharge of runoff sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								earthworks area is stabilised. Considers no earthworks will meet the permitted activity criteria, regardless of size and treatment.	coastal marine area, including via a stormwater network, that is not treated by erosion and sediment control measures, and (v) Erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.		
	Orogen Limited	FS16.232	Woodridge Holdings Ltd	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Not stated	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". 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. 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. 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 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.	Allow	Remove (b) from P.R23 and delete WH.R24 so that earthworks are a Discretionary Activity.	Accept in part
	Orogen Limited	FS32.040	PCL Contracting Ltd as part of CCNZ	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Not stated	Allow	Considers the discharge of sediment from earthworks is unavoidable even with the use of sediment controls. Cites the technical reports for PC1, which reference studies specifying that the sediment removal of all devices are less than 100% and sediment discharges continue to occur, albeit at lower rates, even when the earthworks area is stabilised. Considers no earthworks will meet the permitted activity criteria, regardless of size and treatment	Accept in part
S239.018	Orogen Limited (S239)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Oppose		Considers the proposed TSS limit of 100g/m3 is too restrictive, and is a significant reduction from the existing threshold of 170 NTU that is currently imposed on land use consents. Considers the proposed TSS limit has not been informed by empirical data on sediment control device performance across the Wellington region, or sufficient scientific evidence. States that the technical publications for PC1 do not mention the TSS standard	The submitter requests that the proposed total suspended solids limit is re-drafted to a meaningful threshold that achieves the outcomes sought. The submitter requests that provision is made for the use of NTU (nephelometric turbidity units) as an acceptable unit of measurement.		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								of 100g/m3 and considers there is a lack of connection between the technical reports on the receiving water bodies and the proposed discharge standard. Seeks for the discharge standard to be redrafted in accordance with the best information available, in accordance with Section 1.6 of the NPS-FM. Considers measuring turbidity (NTU) is a reliable proxy for TSS, noting the long testing period for TSS results. Considers the proposed discharge standard disincentivises the use of high efficiency sediment devices, while increasing compliance risks. Concerned that the GWRC Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021) does not provide sufficient guidance to comply with the standard. Considers that the use of low efficiency devices will be encouraged, which will achieve compliance, however will decrease regional performance against target attribute states.			
	Orogen Limited	FS32.041	PCL Contracting Ltd as part of CCNZ	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Not stated	Allow	Considers the proposed TSS limit of 100g/m3 is too restrictive, and is a significant reduction from the existing threshold of 170 NTU that is currently imposed on land use consents. Considers the proposed TSS limit has not been informed by empirical data on sediment control device performance across the Wellington region, or sufficient scientific evidence. States that the technical publications for PC1 do not mention the TSS standard of 100g/m3 and considers there is a lack of connection between the technical reports on the receiving water bodies and the proposed discharge standard. Seeks for the discharge standard to be redrafted in accordance with the best information available, in accordance with Section 1.6 of the NPS-FM. Considers measuring turbidity (NTU) is a reliable proxy for TSS, noting the long testing period for TSS results. Considers the proposed discharge standard disincentivises the use of high efficiency sediment devices,	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										while increasing compliance risks. Concerned that the GWRC Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021) does not provide sufficient guidance to comply with the standard. Considers that the use of low efficiency devices will be encouraged, which will achieve compliance, however will decrease regional performance against target attribute states.	
S239.019	Orogen Limited (S239)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Oppose		Concerned with the proposed non-complying activity status, stating that at the time that consent is applied for, information is not accurate enough to forecast site conditions during the “winter earthworks” period, particularly for larger earthworks which span over preceding non-winter months. Considers a non-complying activity status and requiring the supporting information at the consenting phase will mean the quality of the information provided is poor and will be reliant on assumptions including the size and location of earthworks, the type of construction activities, the performance of the proposed sediment control devices, seasonal variations in the local environment, and the applicant's resourcing capabilities. Seeks for the retention of existing mechanisms for the applications for winter works, allowing for higher quality information to be provided.	Delete (b). Insert earthworks activities during the winter period as a matter of discretion.		Reject
	Orogen Limited	FS32.042	PCL Contracting Ltd as part of CCNZ	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Agree with the proposed .019 as will prevent poor quality information being provided at consenting stage.	Allow	Concerned with the proposed non-complying activity status, stating that at the time that consent is applied for, information is not accurate enough to forecast site conditions during the “winter earthworks” period, particularly for larger earthworks which span over preceding non-winter months. Considers a non-complying activity status and requiring the supporting information at the consenting phase will mean the quality of the information provided is poor and will be reliant on assumptions including the size and location of earthworks, the type of construction activities, the performance of the	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										proposed sediment control devices, seasonal variations in the local environment, and the applicant's resourcing capabilities. Seeks for the retention of existing mechanisms for the applications for winter works, allowing for higher quality information to be provided.	
	Orogen Limited	FS47.418	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S239.019 and delete related discretionary matter (8).	Reject
S240.009	Porirua City Council (S240)			2 Interpretation	Earthworks	Amend		Support use of National Planning Standards definition, and limiting application to new provisions to avoid unintended consequences with operative provisions. Seeks that Rule P.R22 is amended to include exclusions for activities like road maintenance. Notes the reference to the National Policy Statement needs to be updated.	Amend definition as follows:  For Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua only: The alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, and disturbance of land for the installation of fence posts. Except that, for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20, 'earthworks' has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017. Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2023		Accept in part
	Porirua City Council	FS9.106	New Zealand Farm Forestry Association (NZFFA)	2 Interpretation	Earthworks		Oppose	Not stated	Disallow	Not stated	Reject
S240.058	Porirua City Council (S240)			9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Support		Supports management of sediment discharges from earthworks.	Retain as notified.		Accept in part
	Porirua City Council	FS9.155	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.		Oppose	Not stated	Disallow	Not stated	Reject
S240.059	Porirua City Council (S240)			9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Amend		Supports intent of policy, but considers it is written more like a rule or a standard	Reword as a policy, or relocate into rules section of Chapter.		Reject
	Porirua City Council	FS9.156	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for		Oppose	Not stated	Disallow	Not stated	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S240.060	Porirua City Council (S240)			9 Te Awarua-o-Porirua Whaitua	earthworks sites. Policy P.P29: Winter shut down of earthworks.	Oppose		Notes the s32 evaluation states there is higher risk for discharges of sediment from earthworks over the winter period. Considers large storm events cause larger pulses of sediment discharges and that large storm events are becoming more unpredictable and can occur anytime throughout the year. Notes a poor summer earthworks season due to adverse weather may result in significant lost time to safely undertake earthworks, and the winter period may be appropriate for projects to catch up on progress and stabilise the land. Considers the BAU approach for winter earthworks should be maintained, i.e. as a standard condition of consent as a discretionary activity as these conditions allow for GW to provide permits to undertake earthworks within this period as appropriate and subject to conditions.	Amend policy as follows:  Policy P.P29: Winter shut down of earthworks Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).		Accept
	Porirua City Council	FS1.071	Horticulture New Zealand	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Winter shutdown of ancillary rural earthworks would shut down normal agricultural and horticultural practice. Exclude these activities directly or delete the policy.	Allow in part	Delete policy or amend Policy WH.P31 to exclude ancillary rural earthworks and introduce the following definition for ancillary rural earthworks: "Earthworks associated with normal agricultural and horticultural practices, such as: • Maintenance and construction of facilities, devices and structures typically associated with farming activities including but not limited to farm tracks, driveways and unsealed parking areas, stock races, silage pits, farm drains, farm effluent ponds, and feeding lots, fencing, crop protection and sediment control measures • Irrigation and land drainage • The burying of material infected by unwanted organisms as declared by the Ministry of Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993."	Accept
	Porirua City Council	FS11.033	GILLIES GROUP MANAGEMENT LTD	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Agrees that the current approach to winter works management should be maintained and agrees that Policy P.P29 should be deleted.	Allow	Support submission point in full	Accept
	Porirua City Council	FS30.031	Pukerua Holdings Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut		Support	Agrees that the current approach to winter works management should be maintained and agrees that Policy P.P29 should be deleted.	Allow	Support submission point in full	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					down of earthworks.						
	Porirua City Council	FS9.157	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Oppose	Not stated	Disallow	Not stated	Reject
	Porirua City Council	FS48.042	Ministry of Housing and Urban Development (HUD)	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Consider that a blanket exclusion to winter earthworks is too blunt an approach that will impose significant costs to developments. An effects management approach that can consider the likely risk of the site (such as topography, slope soil type, scale and duration of the work) is more appropriate. High rainfall events can occur at any time of year and a blanket ban of winter earthworks does not recognise or manage this.	Allow	Delete policy	Accept
	Porirua City Council	FS47.337	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Meridian agrees earthworks during the winter period should not require consent as a non-complying activity but considers the policy should be deleted, not amended;	Allow	Allow S240.060.	Accept
S240.080	Porirua City Council (S240)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Support		Concerned the 'and' after clause b means that any earthworks City-wide that aren't on a farm technically require consent no matter how small. This is unlikely the intent of the rule and is likely a drafting error. Notes the earthworks definition is aligned with the National Planning Standards and this removes an exemption for road maintenance activities. Considers they should be exempt to remove the need to apply for unnecessary consents which will add costs and delays to the road maintenance programme. Considers exclusion should be in the rule itself to comply with the National Planning Standards. Concerns earthwork consents required for coastal restoration, conservation, and management activities will discourage projects and work against coastal resilience and enhancement. Notes soft engineering approaches to coastal protection, in particular, placement of compacted fill, are increasingly used as the effects of sea level rise start to impact coastlines and compacted fill is low impact relative to rock armouring and other coastal protection methods. Excluding these activities will enable soft engineering approaches to be undertaken without the need to apply for consents which will add significant costs and delays to Council's coastal adaptation programme. Considers this approach is consistent with the Proposed Porirua District Plan and the New Zealand Coastal Policy statement.	Amend rule as follows:  Rule P.R22: Earthworks – permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not exceed 3,000m <sup>2</sup> per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.  Note		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									-This rule excludes coastal restoration, conservation, and management activities where undertaken by a statutory authority or their nominated contractor. -This rule excludes repair or maintenance of existing roads, or repair, sealing or resealing of a road, footpath or driveway where undertaken by a statutory authority or their nominated contractor. -Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).		
	Porirua City Council	FS9.177	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Oppose	Not stated	Disallow	Not stated	Reject
S240.081	Porirua City Council (S240)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Amend		Notes the s32 evaluation states there is higher risk for discharges of sediment from earthworks over the winter period. Considers large storm events cause larger pulses of sediment discharges and that large storm events are becoming more unpredictable and can occur anytime throughout the year. Notes a poor summer earthworks season due to adverse weather may result in significant lost time to safely undertake earthworks, and the winter period may be appropriate for projects to catch up on progress and stabilise the land. Considers the BAU approach for winter earthworks should be maintained, i.e. as a standard condition of consent as a discretionary activity as these conditions allow for GW to provide permits to undertake earthworks within this period as appropriate and subject to conditions.	Amend rule as follows:  Rule P.R23: Earthworks – restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year.		Reject
	Porirua City Council	FS9.178	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Oppose	Not stated	Disallow	Not stated	Reject
	Porirua City Council	FS47.419	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S240.081 and delete related discretionary matter (8).	Reject



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S240.082	Porirua City Council (S240)			9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.	Support		Support in principle	Retain as notified		Reject
	Porirua City Council	FS9.179	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Oppose	Not stated	Disallow	Not stated	Reject
	Porirua City Council	FS47.436	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Oppose	Meridian considers the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;	Disallow	Disallow S240.082 and provide for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.	Accept in part
S241.014	Pukerua Property Group Ltd (S241)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Amend		Considers need for flexibility in policy documents that manage adverse effects of earthworks during certain periods. Considers Policy too blunt in its approach.	Withdraw PC1. If PC1 not withdrawn, delete policy or amend to provide for winter works subject to circumstantial criterion such as risk or likelihood of discharge; Topographical considerations/slope; Management of works; Distance to freshwater resources; Necessity of works; Economic considerations.		Accept
	Pukerua Property Group Ltd	FS13.015	Land Matters Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support in part	LML considers that there has been a failure to carry out an evaluation to the level necessary to determine if proposed change 1 is the most appropriate way to achieve the purpose of the Act and National Policy Statement – Freshwater Water as well as achieving the outcomes of the National Policy Statement on Urban Development. LML also considers that PC1 be delayed until all Whaitua processes have been completed – including the Whaitua Kāpiti which will also allow time to incorporate any review on national planning documents as indicated will occur by the present government coalition.	Allow in part	LML supports withdrawal of PC1 to enable genuine consultation to occur, including with: the development community; landowners of greenfield landowners whereby the land has been identified as suitable for future urban use but not necessarily zoned future urban or urban; and communities who have yet to have freshwater management units.	Reject
	Pukerua Property Group Ltd	FS13.041	Land Matters Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support in part	Not all sites need to be shut down over the winter; and not all effects on sediment discharge occur over this period, as noted by this submitter. This is not the most appropriate method for managing these effects.	Allow in part	LML agrees with the submitter to delete policy WH.P31 and policy WH.P29 relating to winter-works. If that relief is not upheld, LML's supports amending the relevant policies	Accept in part
	Pukerua Property Group Ltd	FS47.034	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support in part	Meridian is concerned that proposed PC1 has been promulgated without consultation with all providers of regionally significant infrastructure and without proper consideration of the particular operational and functional needs of regionally significant infrastructure, including Meridian's lawfully established renewable electricity generation wind farms. Proposed PC1 raises potentially significant	Allow in part	Allow the submission points and withdraw PC1 or, as alternative relief, make the amendments to PC1 detailed in the following further submission points (or such further	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								adverse operational impacts for regionally significant infrastructure, including renewable electricity generation activities, that conflict with the National Policy Statements for Renewable Electricity Generation and Electricity Generation. Proposed PC1 also overrides or upends, without reasonable cause, provisions in the operative NRP for regionally significant infrastructure that were settled by agreement (including the agreement of GWRC) only recently through mediation of appeals on the NRP. Meridian considers that the particular issues of conflict raised in the following submission are capable of resolution by providing appropriate exclusions or exemptions for regionally significant infrastructure (and particularly for lawfully established existing regionally significant infrastructure). These exclusion or exemption provisions are necessary in order for the region's urban and rural communities to function effectively and efficiently, and to enable achievement of the nation's objectives relating to adaptation to climate change. These objectives include enabling increased electricity generation from renewable sources;		or other relief as will achieve the outcome sought by the submission points).	
	Pukerua Property Group Ltd	FS47.190	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S241.014 by deleting Policy WH.P31.	Accept
S243.019	Land Matters Limited (S243)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Amend		Considers need for flexibility in policy for management of adverse effects of earthworks during certain periods. Considers policy is too blunt in its approach.	Delete or amend to provide for winter works subject to circumstantial criterion. That could include: Risk or likelihood of discharge; Topographical considerations/slope; Management of works; Distance to freshwater resources; Necessity of works; Economic considerations.		Accept
	Land Matters Limited	FS16.096	Woodridge Holdings Ltd	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Not stated	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. 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.	Allow	Delete policy and make earthworks great than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	Land Matters Limited	FS38.025	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	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. 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.	Allow	Delete policy and make earthworks great than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	Land Matters Limited	FS47.191	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Oppose in part	Meridian agrees earthworks during the winter period should not require consent as a non-complying activity but considers the policy should be deleted, not amended;	Disallow in part	Allow S243.019 in part by deleting Policy WH.P31.	Accept
S246.010	Water New Zealand (S246)			General comments	General comments - earthworks	Support		Supports the Earthworks rules in both Whaitua chapters.	Not stated		Accept in part
S247.012	Carrus Corporation Ltd (S247)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks	Oppose		Opposes the requirement for non-complying resource consent to undertake winter earthworks. Notes that as high rainfall events can occur during any time of the year, and during summer months when the ground is	Delete policy and related rules.  Policy WH.P31: Winter shut down of earthworks		Accept

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					down of earthworks.			less permeable, it is just as likely that sediment control measures will fail. In some soil conditions (i.e. sand, river gravels) it is preferable works occur when the ground is wet because it reduces the potential for sediment to be blown into waterways. Considers the s32 report fails to justify why this measure is required. Considers the current method of site-specific assessments during winter works in achieving the objectives of the NPS-FW.	Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).		
	Carrus Corporation Ltd	FS16.097	Woodridge Holdings Ltd	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Not stated	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. 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.	Allow	Delete policy and make earthworks great than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	Carrus Corporation Ltd	FS27.1201	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Oppose	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Disallow	Not stated	Reject
	Carrus Corporation Ltd	FS34.009	Orogen Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Refer to Orogen submission S239.004 & S239.012. Winter works is currently effectively managed through current sediment control practices and winter approval procedures. High rainfall events that provide risk to the environment occur outside of the winter period which negate this policy. By the earthworks definition this policy impacts on all civil activities in the	Allow	Delete policies and amend related rules.	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								region and would cripple the civil industry. It needs to be removed as the environmental risks are effectively managed by industry best practice.			
	Carrus Corporation Ltd	FS38.026	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	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. 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.	Allow	Delete policy and make earthworks great than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	Carrus Corporation Ltd	FS47.192	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S247.012 by deleting Policy WH.P31.	Accept
S247.020	Carrus Corporation Ltd (S247)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		Opposes the requirement for non-complying resource consent to undertake winter earthworks. Notes that as high rainfall events can occur during any time of the year, and during summer months when the ground is less permeable, it is just as likely that sediment control measures will fail. In some soil conditions (i.e. sand, river gravels) it is preferable works occur when the ground is wet because it reduces the potential for sediment to be blown into waterways. considers the s32 report fails to justify why this measure is required. Considers the current method of site-specific assessments during winter works in achieving the objectives of the NPS-FW.	Amend rule to as follows. Rule WH.R24: Earthworks – restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year.		Reject
	Carrus Corporation Ltd	FS16.148	Woodridge Holdings Ltd	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Not stated	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". 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. 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. The current method of site-specific assessments during	Allow	Remove (b) from WH.R24 and delete WH.R25 so that earthworks are not a non-complying activity.	Reject

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								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. 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.			
	Carrus Corporation Ltd	FS27.1209	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Disallow	Not stated	Accept in part
	Carrus Corporation Ltd	FS34.010	Orogen Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Refer to Orogen submission S239.004 & S239.012. Winter works is currently effectively managed through current sediment control practices and winter approval procedures. High rainfall events that provide risk to the environment occur outside of the winter period which negate this policy. By the earthworks definition this policy impacts on all civil activities in the region and would cripple the civil industry. It needs to be removed as the environmental risks are effectively managed by industry best practice.	Allow	Delete policies and amend related rules.	Reject
	Carrus Corporation Ltd	FS47.281	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S247.020 and delete related discretionary matter (8).	Reject
S247.025	Carrus Corporation Ltd (S247)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut	Oppose		Opposes the requirement for non-complying resource consent to undertake winter earthworks. Notes that as high rainfall events can occur during any time of the year, and during summer months when the ground is	Delete policy and related rules. Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall:		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					down of earthworks.			less permeable, it is just as likely that sediment control measures will fail. In some soil conditions (i.e. sand, river gravels) it is preferable works occur when the ground is wet because it reduces the potential for sediment to be blown into waterways. Considers the s32 report fails to justify why this measure is required. Considers the current method of site-specific assessments during winter works in achieving the objectives of the NPS-FW.	(a) be shut down from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).		
	Carrus Corporation Ltd	FS27.1214	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Oppose	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Disallow	Not stated	Reject
	Carrus Corporation Ltd	FS34.011	Orogen Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Refer to Orogen submission S239.004 & S239.012. Winter works is currently effectively managed through current sediment control practices and winter approval procedures. High rainfall events that provide risk to the environment occur outside of the winter period which negate this policy. By the earthworks definition this policy impacts on all civil activities in the region and would cripple the civil industry. It needs to be removed as the environmental risks are effectively managed by industry best practice.	Allow	Delete policies and amend related rules.	Accept
	Carrus Corporation Ltd	FS47.338	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S247.025.	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S247.031	Carrus Corporation Ltd (S247)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Amend		Submitter refers to feedback provided on Rule WH.P23 (note no feedback was provided on rule WH.P23 within the submission).	Submitter refers to proposed amendment to Policy WH.R23 (that no amendment was provided for policy WH.P23 within the submission)		Reject
	Carrus Corporation Ltd	FS27.1220	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Oppose	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Disallow	Not stated	Accept in part
	Carrus Corporation Ltd	FS47.420	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S247.031 by deleting clause (b) and related discretionary matter (8).	Reject
S248.003	Ara Poutama Aotearoa the Department of Corrections (S248)			General comments	General comments - earthworks	Oppose		Considers the proposed earthworks policies and rules do not provide for a reasonable level of earthworks activities. Under the earthworks rules proposed by PC1, earthworks on any scale are no longer a permitted activity (unless they are to implement actions in a farm erosion risk treatment plan or farm environmental plan). As a result, all earthworks are a restricted discretionary activity regardless of scale and are a non-complying activity if those earthworks (again regardless of scale) occur between 1 June and 1 October. Although submitter understands the above notified rule framework is an error, submitters comments are made on the plan change as notified given the legal effect of the provisions. Considers it inefficient to require resource consent for almost all earthworks regardless of scale and has concerns this will create a significant administrative burden for	Not stated		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								applicants and Council with little clear environmental benefit. Considers adverse environmental effects associated with small scale earthworks can be appropriately addressed through permitted activity conditions in the NRP and District Plans.Considers restricting all earthworks activities between 1 June and 1 October is overly restrictive and submitter recognises earthworks should be planned so that the majority of bulk earthworks occur outside of the winter months. Notes there may be instances where earthworks are unavoidable at this time, and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Notes that the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), which is referred to in the earthworks provisions as the guiding document for earthworks practice, provides a pathway for earthworks to be undertaken during the winter months subject to careful management (refer specifically to section G5.0 of the guideline), and considers that pathway should continue to be available to applicants through the consent process. Considers that non-complying activity status for earthworks that do not meet restricted discretionary conditions does not sufficiently facilitate the maintenance, upgrade, or development of its sites which leads to a high degree of uncertainty as to whether consents for maintenance, development, or upgrades to corrections sites will be granted under section 104D of the RMA, even where adverse effects of the part of the proposal that triggered non-complying activity status can be appropriately managed through consent conditions.Considers a reasonable level of earthworks, including potentially necessary earthworks during the winter months, should be enabled subject to appropriate conditions to manage potential adverse effects.			
S248.009	Ara Poutama Aotearoa the Department of Corrections (S248)			General comments	General comments - earthworks	Not Stated		Amendments to general policy for management of earthworks to improve practicality of policy.	Amend earthworks policy to improve practicality		Accept
S248.012	Ara Poutama Aotearoa the Department of Corrections (S248)			General comments	General comments - earthworks	Not Stated		Amendment to restricted discretionary activity rule for earthworks, to recognise discharges of sediment are not included under permitted activity rule for earthworks (and are instead covered by the NRP's minor discharge rule R91).	Amendment to the restricted discretionary activity rule for earthworks, to recognise discharges of sediment are not included under the permitted activity rule for earthworks (and are instead covered by the NRP's minor discharge rule R91).		Reject
	Ara Poutama Aotearoa the Department of Corrections	FS28.012	Waka Kotahi NZ Transport Agency	General comments	General comments - earthworks		Support	The change will provide clarity as to how provision relates to 5.2.12 All other discharges R91.	Allow	Not stated	Reject
S248.019	Ara Poutama Aotearoa the Department of Corrections (S248)			5.2 and 5.3 Discharges to land and water and land use rules	Rule R101: Earthworks – permitted activity.	Oppose		Seeks the operative permitted activity rule for earthworks continues to apply within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua, as rules WH.R23 and P.R22 do not provide any permitted activity threshold for earthworks smaller than 3,000m2 per property, and the operative rule provides reasonable conditions for undertaking all other earthworks that are less than 3,000m2 that are not otherwise permitted by WH.R23 and P.R22.	Retain rule R101 so that it continues to apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.		Reject
	Ara Poutama Aotearoa the	FS47.146	Meridian Energy Limited	5.2 and 5.3 Discharges to land and	Rule R101: Earthworks –		Support	Meridian opposes aspects of the Whaitua-specific rules for earthworks management and, if Meridian's	Allow	Allow S248.019 and retain Rule R101 for all Whaitua.	Reject



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Department of Corrections			water and land use rules	permitted activity.			submission points are accepted, agrees Rule R101 should remain for all Whaitua;			
S248.026	Ara Poutama Aotearoa the Department of Corrections (S248)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Amend		Considers the word “risk” should be replaced with “adverse effects”, as resource management policies should seek to manage actual or potential adverse effects of an activity, rather than risks generally. Notes the requirement to retain soil and sediment on site under clause (a) does not recognise that soil and sediment may need to be removed from site in a controlled manner (for example, to a cleanfill area) as part of the works associated with the maintenance, upgrading, or development of existing developed sites. To recognise this, submitter considers that clause (a) should be amended to seek the uncontrolled loss of soil and sediment from site is minimised, rather than requiring all soil and sediment to be retained on site. Considers clause (b) should be qualified with “where practicable” to recognise that any limits placed on land disturbance should be reasonable and proportionate, particularly in the context of the good management practices already required by clause (a)	Amend as follows:  Policy WH.P29: Management of earthworks  The risk adverse effects of sediment discharges from earthworks shall be managed by:  (a) requiring retention minimising the uncontrolled loss of soil and sediment on the land using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), for the duration of the land disturbance, and (b) limiting, where practicable, the amount of land disturbed at any time, and (c) designing and implementing earthworks with knowledge of the existing environmental site constraints, specific engineering requirements and implementation of controls to limit the discharge of sediment to receiving environments, and (d) requiring erosion and sediment control measures to be installed prior to, and during earthworks and ensuring those controls remain in place and are maintained until the land is stabilised against erosion		Accept in part
	Ara Poutama Aotearoa the Department of Corrections	FS33.013	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Support	The policy as currently worded is too absolute and does not recognise that even with implementation of best practice erosion and sediment control measures it may not always be practicable to retain all soil and sediment on site.	Allow	Allow submission and make the changes sought.	Accept in part
	Ara Poutama Aotearoa the Department of Corrections	FS45.003	Kāinga Ora – Homes and Communities	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Support	Kāinga Ora supports the proposed changes to this policy where consistent with its primary submission. Kāinga Ora considers that the changes provide clarity in terms of movement of soil from site where required for cleanfill.	Allow	Considers the word “risk” should be replaced with “adverse effects”, as resource management policies should seek to manage actual or potential adverse effects of an activity, rather than risks generally. Notes the requirement to retain soil and sediment on site under clause (a) does not recognise that soil and sediment may need to be removed from site in a controlled manner (for example, to a cleanfill area) as part of the works associated with the	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										<p>maintenance, upgrading, or development of existing developed sites. To recognise this, submitter considers that clause (a) should be amended to seek the uncontrolled loss of soil and sediment from site is minimised, rather than requiring all soil and sediment to be retained on site. Considers clause (b) should be qualified with "where practicable" to recognise that any limits placed on land disturbance should be reasonable and proportionate, particularly in the context of the good management practices already required by clause (a).</p> <p>Amend as follows: Policy WH.P29: Management of earthworks The risk adverse effects of sediment discharges from earthworks shall be managed by: (a) requiring retention minimising the uncontrolled loss of soil and sediment on the land using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), for the duration of the land disturbance, and (b) limiting, where practicable, the amount of land disturbed at any time, and (c) designing and implementing earthworks with knowledge of the existing environmental site constraints, specific engineering requirements and</p>	

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										implementation of controls to limit the discharge of sediment to receiving environments, and (d) requiring erosion and sediment control measures to be installed prior to, and during earthworks and ensuring those controls remain in place and are maintained until the land is stabilised against erosion	
	Ara Poutama Aotearoa the Department of Corrections	FS31.056	Wellington International Airport Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Support in part	WIAL supports the focus of the policy onto effects (as per the RMA). In addition to the scenario used in WIAL's submission, WIAL also agrees that some sediment may need to be discharged to a cleanfill, therefore not retaining on site. WIAL also agrees that it is appropriate to qualify limb c to recognise that limits placed on land disturbance should be reasonable and proportionate, particularly where good management practices are already in place.	Allow in part	Amend Policy WH.P29 as follows: Management of earthworks The risk adverse effects of sediment discharges from earthworks shall be managed by: (a) requiring retention minimising the uncontrolled loss of soil and sediment on the land using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), for the duration of the land disturbance, and (b) limiting, where practicable, the amount of land disturbed at any time, and (c) ...	Accept in part
S248.027	Ara Poutama Aotearoa the Department of Corrections (S248)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Support		Considers standards set out in policy to be reasonable.	Retain as notified		Accept in part
	Ara Poutama Aotearoa the Department of Corrections	FS33.014	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Support	The standards set out in the policy are reasonable.	Allow	Allow submission and make the changes sought.	Accept
S248.028	Ara Poutama Aotearoa the Department of Corrections (S248)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose		Considers a policy requiring all earthworks over 3,000m2 to be shut down over the winter months is inappropriate, as it does not recognise there may be circumstances where earthworks need to occur over those months in order to provide for safe and efficient operation, maintenance, upgrading, or development	Delete policy		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								of prison infrastructure.Considers there are instances where earthworks are unavoidable at this time, and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Notes GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), which is referred to in the policy, provides a pathway for earthworks to be undertaken during the winter months subject to careful management and considers pathway should continue to be available to applicants through consent process.			
	Ara Poutama Aotearoa the Department of Corrections	FS16.098	Woodridge Holdings Ltd	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Not stated	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.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.	Allow	Delete policy and make earthworks great than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	Ara Poutama Aotearoa the Department of Corrections	FS47.193	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S248.028 by deleting Policy WH.P31.	Accept
	Ara Poutama Aotearoa the Department of Corrections	FS50.007	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	NZCF supports the submission and similarly considers that a pathway should be provided for earthworks during winter months consistent with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).	Allow	Not stated	Accept
S248.041	Ara Poutama Aotearoa the Department of Corrections (S248)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		Notes effect of use of “and” at the end of condition (b) is to exclude all earthworks not related to implementing farm erosion risk treatment plans or farm environmental plans from the permitted activity rule. As a result, all other earthworks, regardless of size or whether they meet conditions (c) to (h) will be a restricted discretionary activity under rule WH.R24. Considers this is an error and acknowledges Council have corrected this under clause 16 of Schedule 1 to the RMA by way of a memo published on 6 December 2023.Notes it cannot be efficient or effective to require resource consent for all earthworks, regardless of scale. Considers this does this appear to be consistent with policies WH.P30 and WH.P31, which place emphasis on controlling earthworks over 3,000m2. Considers that it is appropriate that smaller scale earthworks are generally provided for as a permitted activity under rule (subject to the conditions set out under the rule). To achieve this, “and” should be replaced with “or” at the end of condition (b). Any further changes to this rule will be dependent on how ‘earthworks’ are defined and any exclusions.Opposes rule being included within freshwater planning instrument, as purpose of rule is to manage land use for purposes of soil conservation. As rule does not provide for discharges associated with earthworks, there is no justification for including it in freshwater planning instrument, seeks that it be reallocated to Part 1 Schedule 1 planning instrument.	Amend rule as follows:  Rule WH.R23: Earthworks – permitted activity  Earthworks is a permitted activity, provided the following conditions are met:  (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									<p>surface water body or the coastal marine area, including via a stormwater network, and</p> <p>(h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.</p> <p>Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021). In addition to this, reallocate the rule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.</p>		
S248.042	Ara Poutama Aotearoa the Department of Corrections (S248)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		<p>Depending on the outcome of other submission points, submitter considers several amendments to the rule are necessary. Considers rule should be restructured to locate “associated discharge” element of rule to follow on from “Earthworks that do not comply with Rule WH.R23” as discharges associated with permitted earthworks are not provided for under rule WH.R23 (which only permits earthworks). Discharges from permitted earthworks are instead provided for under the “minor discharges” rule R91. Considers a condition requiring earthworks be shut down over the winter months is inappropriate, as it does not recognise circumstances where earthworks need to occur over those months in order to provide for safe and efficient operation, maintenance, upgrading, or development of regionally significant infrastructure. Recognises earthworks should be planned so majority of bulk earthworks occur outside of winter months. Considers instances where earthworks are unavoidable and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Notes GWRC Erosion and Sediment Control Guideline for Wellington Region (2021), which is referred to in policy WH.P31 (and in the note to permitted activity rule WH.R23), provides a pathway for earthworks to be undertaken during winter months subject to careful management. Considers rather than a blanket restriction on all earthworks over this period, reference is made to matters set out under section G5.0 of guideline as a matter of discretion for earthworks.</p>	<p>Amend rule as follows:</p> <p>Rule WH.R24: Earthworks – restricted discretionary activity</p> <p>Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23, and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, is a restricted discretionary activity, provided the following conditions are met:</p> <p>(a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m<sup>3</sup>, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m<sup>3</sup>, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than:</p> <p>(i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and</p> <p>(b) earthworks shall not occur between 1st June and 30th September in any year.</p> <p>Matters for discretion</p> <p>1. The location, area, scale, volume, duration and staging and timing of works</p>		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									<p>2. The design and suitability of erosion of sediment control measures including consideration of hazard mitigation and the risk of accelerated soil erosion associated the staging of works and progressive stabilisation</p> <p>3. The placement and treatment of stockpiled materials on the site, including requirements to remove material if it is not to be reused on the site</p> <p>4. The proportion of unstabilised land in the catchment</p> <p>5. The adequacy and efficiency of stabilisation devices for sediment control</p> <p>6. Any adverse effects on:</p> <p>(i) groundwater, surface water bodies and their margins, particularly surface water bodies within sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori customary use) or Schedule I (important trout fishery rivers and spawning waters)</p> <p>(ii) group drinking water supplies and community drinking water supplies</p> <p>(iii) mauri, water quality (including water quality in the coastal marine area), aquatic and marine ecosystem health, aquatic and riparian habitat quality, indigenous biodiversity values, mahinga kai and critical life cycle periods for indigenous aquatic species</p> <p>(iv) the natural character of lakes, rivers, natural wetlands and their margins and the coastal environment</p> <p>(v) natural hazards, land stability, soil erosion, sedimentation and flood hazard management including the use of natural buffers</p> <p>7. Duration of the consent</p> <p>8. Preparation required for the close-down period (from 1st June to 30th September each year) and any maintenance activities required during this period Where earthworks will be undertaken within the period from 1 June to 30 September, the matters set out under section G5.0 of the Greater Wellington Regional Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021)</p> <p>9. Monitoring and reporting requirements</p> <p>Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land</p>		

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									Disturbing Activities in the Wellington Region (2021).		
	Ara Poutama Aotearoa the Department of Corrections	FS47.282	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Meridian agrees the rule should provide for associated discharges and agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S248.042.	Accept in part
S248.043	Ara Poutama Aotearoa the Department of Corrections (S248)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.	Amend		Considers that the move to non-complying activity status for all other earthworks is not clearly explained or justified in the section 32 evaluation report. Non-compliance with conditions under rule WH.R25 will trigger the non-complying activity rule.Considers non-complying activity status for minor breaches of rule conditions can be a particular issue for development or upgrading of existing assets, as it can sometimes involve complex, bundled consents for a broad range of activities, some of which may have adverse effects that are more than minor (for example, visual effects). Considers this leads to a high degree of uncertainty as to whether consents for development or upgrading of Ara Poutama's assets will be granted under section 104D of the RMA, even where the adverse effects of the part of the proposal that triggered non-complying activity status can be appropriately addressed through consent conditions.Considers the non-complying activity rule is not sufficiently justified in section 32 report and does not appropriately provide for activities that do not meet restricted discretionary activity conditions, but which can otherwise be managed through consent conditions as a discretionary activity.	Amend rule as follows:  Rule WH.R25: Earthworks – non-complying discretionary activity  Earthworks, and the associated discharge of sediment into a surface water body or coastal water or onto or into land where it may enter a surface water body or coastal water from earthworks, including via a stormwater network, that does not comply with Rule WH.R24 is a non-complying discretionary activity.		Accept
	Ara Poutama Aotearoa the Department of Corrections	FS28.018	Waka Kotahi NZ Transport Agency	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Support	Support deletion of non- complying activity.	Allow	Not stated	Accept
	Ara Poutama Aotearoa the Department of Corrections	FS47.299	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Support in part	Meridian agrees the non-complying activity status is onerous, particularly for earthworks associated with large scale regionally significant infrastructure projects. Meridian considers winter works should be provided for as restricted discretionary activities, subject to conditions. Non-compliance with effects-based conditions should be discretionary activity, not non-complying activity;	Allow in part	Allow S248.043 by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.	Accept in part
S248.050	Ara Poutama Aotearoa the Department of Corrections (S248)			9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Amend		Considers the word “risk” should be replaced with “adverse effects”, as resource management policies should seek to manage actual or potential adverse effects of an activity, rather than risks generally.Notes the requirement to retain soil and sediment on site under clause (a) does not recognise that soil and sediment may need to be removed from site in a controlled manner (for example, to a cleanfill area) as part of the works associated with the maintenance, upgrading, or development of existing developed sites. To recognise this, submitter considers that clause (a) should be amended to seek the uncontrolled loss of soil and sediment from site is minimised, rather than requiring all soil and sediment to be retained on site.Considers clause (b) should be qualified with “where practicable” to recognise that any limits placed on land disturbance should be reasonable and proportionate, particularly in the	Amend as follows:  Policy P.P27: Management of earthworks sites  The risk adverse effects of sediment discharges from earthworks shall be managed by:  (a) requiring retention minimising the uncontrolled loss of soil and sediment on the site using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								context of the good management practices already required by clause (a)	Land Disturbing Activities in the Wellington Region (2021), for the duration of the land disturbance, and (b) limiting, where practicable, the amount of land disturbed at any time, and (c) designing and implementing earthworks with knowledge of the existing environmental site constraints, specific engineering requirements and implementation of controls to limit the discharge of sediment to receiving environments, and (d) requiring erosion and sediment control measures to be installed prior to, and during earthworks and ensuring those controls remain in place and are maintained until the land is stabilised against erosion.		
	Ara Poutama Aotearoa the Department of Corrections	FS28.015	Waka Kotahi NZ Transport Agency	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.		Support	Changes proposed will improve clarity of the provisions.	Allow	Not stated	Accept
	Ara Poutama Aotearoa the Department of Corrections	FS33.030	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.		Support	The policy as currently worded is too absolute and does not recognise that even with implementation of best practice erosion and sediment control measures it may not always be practicable to retain all soil and sediment on site.	Allow	Allow submission and make the changes sought.	Accept
	Ara Poutama Aotearoa the Department of Corrections	FS45.004	Kāinga Ora – Homes and Communities	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.		Support	Kāinga Ora supports the proposed changes to this policy where consistent with its primary submission. Kāinga Ora considers that the changes provide clarity in terms of movement of soil from site where required for cleanfill.	Allow	Considers the word "risk" should be replaced with "adverse effects", as resource management policies should seek to manage actual or potential adverse effects of an activity, rather than risks generally. Notes the requirement to retain soil and sediment on site under clause (a) does not recognise that soil and sediment may need to be removed from site in a controlled manner (for example, to a cleanfill area) as part of the works associated with the maintenance, upgrading, or development of existing developed sites. To recognise this, submitter considers that clause (a) should be amended to seek the uncontrolled loss of soil and sediment from site is minimised, rather than requiring all soil	Accept in part



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										<p>and sediment to be retained on site. Considers clause (b) should be qualified with "where practicable" to recognise that any limits placed on land disturbance should be reasonable and proportionate, particularly in the context of the good management practices already required by clause (a).</p> <p>Amend as follows: Policy WH.P29: Management of earthworks The risk adverse effects of sediment discharges from earthworks shall be managed by: (a) requiring retention minimising the uncontrolled loss of soil and sediment on the land using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), for the duration of the land disturbance, and (b) limiting, where practicable, the amount of land disturbed at any time, and (c) designing and implementing earthworks with knowledge of the existing environmental site constraints, specific engineering requirements and implementation of controls to limit the discharge of sediment to receiving environments, and (d) requiring erosion and sediment control measures to be installed prior to, and during earthworks and ensuring those controls remain in place and are maintained</p>	

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										until the land is stabilised against erosion	
	Ara Poutama Aotearoa the Department of Corrections	FS47.321	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.		Support	Meridian agrees that complete retention of soil and sediment on site is not practicable in all situations, including where soil and sediment need to be removed from site in a controlled manner;	Allow	Allow S248.050.	Accept in part
S248.051	Ara Poutama Aotearoa the Department of Corrections (S248)			9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Support		Considers standards set out in the policy to be reasonable.	Retain as notified		Accept in part
	Ara Poutama Aotearoa the Department of Corrections	FS33.031	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.		Support	The standards set out in the policy are reasonable.	Allow	Allow submission and make the changes sought.	Accept in part
S248.052	Ara Poutama Aotearoa the Department of Corrections (S248)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose		Considers a policy requiring all earthworks over 3,000m2 to be shut down over the winter months is inappropriate, as it does not recognise there may be circumstances where earthworks need to occur over those months in order to provide for safe and efficient operation, maintenance, upgrading, or development of prison infrastructure. Considers there are instances where earthworks are unavoidable at this time, and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Notes GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), which is referred to in the policy, provides a pathway for earthworks to be undertaken during the winter months subject to careful management and considers pathway should continue to be available to applicants through consent process.	Delete policy		Accept
	Ara Poutama Aotearoa the Department of Corrections	FS47.339	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S248.52.	Accept
	Ara Poutama Aotearoa the Department of Corrections	FS50.010	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	NZCF supports the submission and similarly considers that a pathway should be provided for earthworks during winter months consistent with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).	Allow	Not stated	Accept
S248.064	Ara Poutama Aotearoa the Department of Corrections (S248)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Amend		Notes effect of use of “and” at the end of condition (b) is to exclude all earthworks not related to implementing farm erosion risk treatment plans or farm environmental plans from the permitted activity rule. As a result, all other earthworks, regardless of size or whether they meet conditions (c) to (h) will be a restricted discretionary activity under rule P.R23. Considers this is an error and acknowledges Council have corrected this under clause 16 of Schedule 1 to the RMA by way of a memo published on 6 December 2023. Notes it cannot be efficient or effective to require resource consent for all earthworks, regardless of scale. Considers this does this appear to be consistent with policies P.P28 and P.P29, which place emphasis on controlling earthworks over 3,000m2. Considers that it is appropriate that smaller scale earthworks are generally provided for as a permitted	Amend rule as follows: Rule P.R22: Earthworks – permitted activity  Earthworks is a permitted activity, provided the following conditions are met:  (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								activity under rule (subject to the conditions set out under the rule). To achieve this, “and” should be replaced with “or” at the end of condition (b). Any further changes to this rule will be dependent on how ‘earthworks’ are defined and any exclusions. Opposes rule being included within freshwater planning instrument, as purpose of rule is to manage land use for purposes of soil conservation. As rule does not provide for discharges associated with earthworks, there is no justification for including it in freshwater planning instrument, seeks that it be reallocated to Part 1 Schedule 1 planning instrument.	5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.  Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021). In addition to this, reallocate the rule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.		
S248.065	Ara Poutama Aotearoa the Department of Corrections (S248)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Amend		Depending on the outcome of other submission points, submitter considers several amendments to the rule are necessary. Considers rule be restructured to locate “associated discharge” element of rule to follow on from “Earthworks that do not comply with Rule P.R22” as discharges associated with permitted earthworks are not provided for under rule P.R22 (which only permits earthworks). Discharges from permitted earthworks are instead provided for under the “minor discharges” rule R91. Considers a condition requiring earthworks be shut down over the winter months is inappropriate, as it does not recognise circumstances where earthworks need to occur over those months in order to provide for safe and efficient operation, maintenance, upgrading, or development of regionally significant infrastructure. Recognises earthworks should be planned so majority of bulk earthworks occur outside of winter months. Considers instances where earthworks are unavoidable and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Notes GWRC Erosion and Sediment Control Guideline for Wellington Region (2021), which is referred to in policy WH.P31 (and in the note to permitted activity rule WH.R23), provides a pathway for earthworks to be undertaken during winter months subject to careful management. Considers rather than a blanket restriction on all earthworks over this period, reference is made to	Amend rule as follows:  Rule P.R23: Earthworks – restricted discretionary activity  Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule P.R22, and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, is a restricted discretionary activity, provided the following conditions are met:  (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								matters set out under section G5.0 of guideline as a matter of discretion for earthworks.	exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year. Matters for discretion 1. The location, area, scale, volume, duration and staging and timing of works 2. The design and suitability of erosion of sediment control measures including consideration of hazard mitigation and the risk of accelerated soil erosion associated the staging of works and progressive stabilisation 3. The placement and treatment of stockpiled materials on the site, including requirements to remove material if it is not to be reused on the site The proportion of unstabilised land in the catchment 5. The adequacy and efficiency of stabilisation devices for sediment control 6. Any adverse effects on: (i) groundwater, surface water bodies and their margins, particularly surface water bodies within sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori customary use) or Schedule I (important trout fishery rivers and spawning waters) (ii) group drinking water supplies and community drinking water supplies (iii) mauri, water quality (including water quality in the coastal marine area), aquatic and marine ecosystem health, aquatic and riparian habitat quality, indigenous biodiversity values, mahinga kai and critical life cycle periods for indigenous aquatic species (iv) the natural character of lakes, rivers, natural wetlands and their margins and the coastal environment (v) natural hazards, land stability, soil erosion, sedimentation and flood hazard management including the use of natural buffers 7. Duration of the consent 8. Preparation required for the close-down period (from 1st June to 30th September each year) and any maintenance activities required during this period Where earthworks will be undertaken within the period from 1		

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									<p>June to 30 September, the matters set out under section G5.0 of the Greater Wellington Regional Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021)</p> <p>9. Monitoring and reporting requirements</p> <p>Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).</p>		
	Ara Poutama Aotearoa the Department of Corrections	FS47.421	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Meridian agrees the rule should provide for associated discharges and agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S248.065.	Accept
S248.066	Ara Poutama Aotearoa the Department of Corrections (S248)			9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.	Amend		Considers that the move to non-complying activity status for all other earthworks is not clearly explained or justified in the section 32 evaluation report. Non-compliance with conditions under rule P.R25 will trigger the non-complying activity rule. Considers non-complying activity status for minor breaches of rule conditions can be a particular issue for development or upgrading of existing assets, as it can sometimes involve complex, bundled consents for a broad range of activities, some of which may have adverse effects that are more than minor (for example, visual effects). Considers this leads to a high degree of uncertainty as to whether consents for development or upgrading of Ara Poutama's assets will be granted under section 104D of the RMA, even where the adverse effects of the part of the proposal that triggered non-complying activity status can be appropriately addressed through consent conditions. Considers the non-complying activity rule is not sufficiently justified in section 32 report and does not appropriately provide for activities that do not meet restricted discretionary activity conditions, but which can otherwise be managed through consent conditions as a discretionary activity.	Amend rule as follows:  Rule P.R24: Earthworks – non-complying discretionary activity Earthworks, and the associated discharge of sediment into a surface water body or coastal water or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule P.R23 is a non-complying discretionary activity.		Accept
	Ara Poutama Aotearoa the Department of Corrections	FS28.017	Waka Kotahi NZ Transport Agency	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Support	Support deletion of non-complying activity.	Allow	Not stated	Accept
	Ara Poutama Aotearoa the Department of Corrections	FS47.437	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Support in part	Meridian considers the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;	Allow in part	Disallow S248.066 and provide for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.	Accept in part
S252.012	Thames Pacific (S252)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose		Opposes the requirement for non-complying resource consent to undertake winter earthworks. Notes high rainfall events can occur during any time of the year, and during summer months when the ground is less permeable, it is just as likely that sediment control	<p>Delete policy and related rules.</p> <p>Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall:</p>		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								measures will fail. In some soil conditions (i.e. sand, river gravels) it is preferable works occur when the ground is wet because it reduces the potential for sediment to be blown into waterways. Considers the s32 report fails to justify why this measure is required. Considers the current method of site-specific assessments during winter works in achieving the objectives of the NPS-FW.	(a) be shut down from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).		
	Thames Pacific	FS47.194	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S252.012 by deleting Policy WH.P31.	Accept
S252.019	Thames Pacific (S252)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		Opposes the requirement to seek a non-complying resource consent to undertake winter earthworks. Submitter notes that as high rainfall events can occur during any time of the year, and during summer months when the ground is less permeable, it is just as likely that sediment control measures will fail. Considers the proposed approach to be inappropriate as in some soil conditions (i.e. sand, river gravels) it is preferable works occur when the ground is wet. This is because it reduces the potential for sediment to be blown into waterways. The submitter suggests this is a position shared by GWRC's technical advisors. considers the s32 report fails to justify why this measure is required. Considers the current method of site-specific assessments during winter works in achieving the objectives of the NPS-FW.	Amend rule to as follows. Rule WH.R24: Earthworks – restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year.		Reject
	Thames Pacific	FS47.283	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S252.019 and delete related discretionary matter (8).	Reject
S252.023	Thames Pacific (S252)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose		Opposes the requirement for non-complying resource consent to undertake winter earthworks. Notes high rainfall events can occur during any time of the year, and during summer months when the ground is less permeable, it is just as likely that sediment control measures will fail. In some soil conditions (i.e. sand, river gravels) it is preferable works occur when the ground is wet because it reduces the potential for sediment to be blown into waterways. Considers the s32 report fails to justify why this measure is required. Considers the current method of site-specific assessments during winter works in achieving the objectives of the NPS-FW.	Delete policy and related rules. Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									Guidelines for Land Disturbing Activities in the Wellington Region (2021).		
	Thames Pacific	FS47.340	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S252.023.	Accept
S252.030	Thames Pacific (S252)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Amend		Submitter refers to feedback provided on Rule WH.P23 (note no feedback was provided on rule WH.P23 within the submission).	Submitter refers to proposed amendment to Policy WH.R23 (note no amendment was provided for Policy WH.P23 within the submission)		Reject
	Thames Pacific	FS47.422	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S252.030 by deleting clause (b) and delete related discretionary matter (8).	Reject
S254.005	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd (S254)			2 Interpretation	Earthworks	Amend		Notes the definition of earthworks has been expanded and therefore opening a trench to install services would trigger the need for a resource consent if the area of disturbance exceeded 3000m2.	The original definition be retained or the definition be amended by adding activities such as service trenches and scraping a site for the purpose of determining site levels to the exclusions list.		Reject
	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd	FS16.045	Woodridge Holdings Ltd	2 Interpretation	Earthworks		Not stated	The cost and time implications of the "Earthworks" definition do not appear to have been thought through or considered in the s32 analysis.	Allow	Provide one definition for earthworks for the region.  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.	Reject
	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd	FS43.007	Rosco Ice Cream Ltd	2 Interpretation	Earthworks		Support	The proposed definition for the two whaitua removes all reasonable permitted exceptions from the current definition and only excludes gardening, cultivation and post holes. The same earthworks definition should apply across the whole region.	Allow	Amend definition of 'earthworks' to delete the separate definitions for Te Whanganui-a-Tara and Te Awarua-o-Porirua whaitua.	Reject
	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd	FS47.110	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow S254.005.	Reject
S254.010	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd (S254)			9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Amend		Notes that for turbidity to be measured using a new method of Total Suspended Solids requires a laboratory test to measure and cannot readily be done in the field.	Amend the Policy to refer to an NTU standard.		Accept
S254.011	Best Farm Ltd, Lincolnshire Farm Ltd,			9 Te Awarua-o-	Policy P.P29: Winter shut	Oppose		Considers it is entirely possible and reasonable to work into June or start in September after a dry winter and argues against preventing earthworks during	Delete the policy or amend to have more flexibility for winter works.		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Hunters Hill Ltd & Stebbings Farmlands Ltd (S254)			Porirua Whaitua	down of earthworks.			these months. Notes such an approach has been in place for many years but does not work and unreasonably affects business operations.			
	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd	FS16.176	Woodridge Holdings Ltd	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Not stated	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.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.	Allow	Delete policy and make earthworks greater than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd	FS47.341	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure. Meridian supports deletion, not amendment, of the policy;	Allow	Allow S254.011.	Accept
S254.019	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd (S254)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Oppose		Considers no discharge of sediment from earthworks is a physical impossibility and notes sediment is discharged off all natural landscapes during rain as a natural process. Notes that condition (v) requires the use of ESC devices to prevent a discharge but considers it is impossible to achieve this and the GWRC ESC guidelines do not stipulate this outcome.	Delete clause (g)		Accept
	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd	FS16.227	Woodridge Holdings Ltd	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Not stated	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 lower rates, even when the earthworks area is stabilised. No earthworks will meet the permitted activity criteria,regardless of size and treatment.	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.”  Amend Items (c)(1v) and (c)(v) so that they allow an appropriate level of SS in any stormwater discharge	Accept in part
	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd	FS47.398	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Meridian agrees clause (g) is impractical;	Allow	Allow S254.019.	Accept
S254.020	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd (S254)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Oppose		Notes that for turbidity to be measured using a new method of Total Suspended Solids requires a laboratory test to measure and cannot readily be done in the field.Does not support the winter shutdown periods (Clause b) promoted through Policy 29. Considers it is entirely possible and reasonable to work into June or start in September after a dry winter and argues against preventing earthworks during these months. Notes such an approach has been in place for many years but does not work and unreasonably affects business operations.	The policy be deleted or amended to have more flexibility, and amend rule to refer to NTU standard.		Accept
	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd	FS16.233	Woodridge Holdings Ltd	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Not stated	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".The matter for discretion, "The proportion of unestablished land in the	Allow	Remove (b) from P.R23 and delete WH.R24 so that earthworks are a Discretionary Activity.	Reject



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								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. 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. 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 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.			
	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd	FS47.423	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S254.020 by deleting clause (b) and delete related discretionary matter (8).	Reject
S255.009	Woodridge Holdings Ltd (S255)			2 Interpretation	Earthworks	Amend		Not stated	The second definition "For all other whaitua"/catchments should apply across the entire region. Add additional exclusions for activities as appropriate.		Reject
	Woodridge Holdings Ltd	FS43.006	Rosco Ice Cream Ltd	2 Interpretation	Earthworks		Support	The proposed definition for the two whaitua removes all reasonable permitted exceptions from the current definition and only excludes gardening, cultivation and post holes. The same earthworks definition should apply across the whole region.	Allow	Amend definition of 'earthworks' to delete the separate definitions for Te Whanganui-a-Tara and Te Awarua-o-Porirua whaitua.	Reject
	Woodridge Holdings Ltd	FS47.111	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The operative NRP definition, with including the listed excluded activities, should apply throughout the region. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow S255.009.	Reject
S255.015	Woodridge Holdings Ltd (S255)			2 Interpretation	Stabilisation	Amend		Considers applying a definition to part of the region and nothing to the rest is inequitable and confusing. The definition should acknowledge that some areas inherently stable without the need to measures to be undertaken, eg.: exposed rock surfaces.	Provide one definition for the entire region. Amend to acknowledge that some areas are inherently stable and as such do not require stabilisation.		Reject
	Woodridge Holdings Ltd	FS45.099	Kāinga Ora – Homes and Communities	2 Interpretation	Stabilisation		Support	Kāinga Ora agree that definitions relating to parts of the region that aren't specific to the outcomes for that catchment should be applied across the whole region to provide plan clarity.	Allow	Considers applying a definition to part of the region and nothing to the rest is inequitable and confusing. The definition should acknowledge that some areas inherently stable without the need to measures to be undertaken, eg.: exposed rock surfaces.  Provide one definition for the entire region. Amend to acknowledge that some areas are inherently stable and	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										as such do not require stabilisation.	
S255.031	Woodridge Holdings Ltd (S255)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose		Considers the policy is not effects based as not every earthworks project over 3,000m2 will have negative adverse effects if works are underway between 1 June and 30 September. Considers each job should be treated on its merits and conditioned accordingly.	Delete policy		Accept
	Woodridge Holdings Ltd	FS34.038	Orogen Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Refer to Orogen submission S239.004, S239.011, S239.012 & S239.019. A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approach to earthworks provides a better outcome for industry and compliance.	Allow	Delete policy and amend associated rules.	Accept
	Woodridge Holdings Ltd	FS47.195	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S255.031 by deleting Policy WH.P31.	Accept
	Woodridge Holdings Ltd	FS50.180	New Zealand Carbon Farming Group ('NZCF')	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	NZCF supports the submission and considers that a pathway should be provided for earthworks during winter months consistent with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).	Allow	Not stated	Accept
S255.037	Woodridge Holdings Ltd (S255)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Oppose		Considers it will not be possible to comply with these rules as their conditions specify that there should be no discharge of sediment and suggests the majority small scale earthworks which are currently permitted would need a consent to ensure compliance is not an issue. Concern about GW resourcing to accommodate the costs generated by PC1. Considers WRC's own ESCP Guidelines don't consider or provide solutions for the level of treatment required, which is greater than that of a permitted stormwater discharge. Notes that as a result of these rules, the pre-earthworks development is allowed to discharge a prescribed level of SS and the post-development site is allowed to discharge a prescribed level of SS but the development phase is not allowed any, and topography and permeability in Wellington and Porirua makes treatment difficult.	Withdraw and redraft PC1 or amend Rules WH.R23 and P.P22 so that they allow an appropriate level of SS in any stormwater discharge. 50g/m3 to Schedule A sites and 100g/m3 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).		Reject
	Woodridge Holdings Ltd	FS34.040	Orogen Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	See Orogen submission point S239.009	Allow	Adopt submission to review stormwater discharge standards and redraft PC1	Reject
	Woodridge Holdings Ltd	FS45.101	Kāinga Ora – Homes and Communities	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support in part	Subject to the Kāinga Ora primary submission, as notified, the rule requires EW consent for ALL EW (no matter scale) unless all discharge can be prevented, which essentially means water has to be contained on site until EW stabilisation. This is not practical and has resulted in most urban development, even small scale EW requiring a regional discharge consent.	Allow in part	Considers it will not be possible to comply with these rules as their conditions specify that there should be no discharge of sediment and suggests the majority small scale earthworks which are currently permitted would need a consent to ensure compliance is not an issue. Concern about GW resourcing to accommodate the costs generated by PC1. Considers WRC's own ESCP Guidelines don't consider or provide	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										<p>solutions for the level of treatment required, which is greater than that of a permitted stormwater discharge. Notes that as a result of these rules, the pre-earthworks development is allowed to discharge a prescribed level of SS and the post-development site is allowed to discharge a prescribed level of SS but the development phase is not allowed any, and topography and permeability in Wellington and Porirua makes treatment difficult.</p> <p>Withdraw and redraft PC1 or amend Rules WH.R23 and P.P22 so that they allow an appropriate level of SS in any stormwater discharge. 50g/m3 to Schedule A sites and 100g/m3 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).</p>	
S255.038	Woodridge Holdings Ltd (S255)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		Considers in most cases it will not be possible to comply with Items (c)(1v) and (c)(v) of Rule WH.R23 as they specify that there should be no discharge of sediment and therefore nearly all small scale earthworks which are currently permitted would require a WRC consent. Notes the rule requires a level of treatment that is greater than that permitted under WH.R3. Notes the pre-earthworks development is allowed to discharge a prescribed level of SS and the post-development site is allowed to discharge a prescribed level of SS but the development phase is not allowed any, and topography and permeability in Wellington and Porirua makes treatment difficult. Notes the GWRC Guidelines referenced in the note below this rule are not designed to achieve “no discharge of sediment” but none of the measures specified, even the sediment retention ponds can be guaranteed to remove all sediment.	Amend Items (c)(1v) and (c)(v) so that they allow an appropriate level of SS in any stormwater discharge. 50g/m3 to Schedule A sites and 100g/m3 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).		Reject
	Woodridge Holdings Ltd	FS34.041	Orogen Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	See Orogen submission point S239.009	Allow	Adopt submission to review stormwater discharge standards and redraft PC1	Reject
S255.039	Woodridge Holdings Ltd (S255)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted	Amend		Notes 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	Delete WH.R24(b) Provide guidance as to the % of a catchment which can be developed at onetime and guidance as to how “The		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					discretionary activity.			during this period will have negative effects. Considers each job should be treated on its merits and conditioned accordingly, and one of the matters for discretion under this rule is the “timing of the works”. Notes 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. Questions if the % limit for a catchment is exceeded because there are multiple developments in the area, how does Council decide who goes first? Considers this could cause a trade competition issue.	proportion of unestablished land in the catchment.” matter for discretion will work.		
	Woodridge Holdings Ltd	FS34.042	Orogen Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Refer to Orogen submission S239.004, S239.011, S239.012 & S239.019. A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approach to earthworks provides a better outcome for industry and compliance.	Allow	Delete policy and amend associated rules.	Accept in part
	Woodridge Holdings Ltd	FS47.284	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S255.039 and delete related discretionary matter (8).	Reject
S255.050	Woodridge Holdings Ltd (S255)			9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Amend		This policy relates to the discharge standards for earthworks sites and makes reference to discharge standard for turbidity to be measured using a new method of Total Suspended Solids. Notes this test requires a laboratory to measure and cannot readily be done in the field.	We request the Policy be amended to refer to an NTU standard.		Accept
S255.051	Woodridge Holdings Ltd (S255)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose		Considers the policy is not effects based as not every earthworks project over 3,000m2 will have negative adverse effects if works are underway between 1 June and 30 September. Considers each job should be treated on its merits and conditioned accordingly.	Delete policy		Accept
	Woodridge Holdings Ltd	FS34.039	Orogen Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Refer to Orogen submission S239.004, S239.011, S239.012 & S239.019. A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approach to earthworks provides a better outcome for industry and compliance.	Allow	Delete policy and amend associated rules.	Accept
	Woodridge Holdings Ltd	FS47.342	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S255.051.	Accept
	Woodridge Holdings Ltd	FS50.181	New Zealand Carbon Farming Group ('NZCF')	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	NZCF supports the submission and considers that a pathway should be provided for earthworks during winter months consistent with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).	Allow	Not stated	Accept
S255.072	Woodridge Holdings Ltd (S255)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Oppose		See submission point on rule WH.R23.	See submission point on rule WH.R23.		Reject
S255.073	Woodridge Holdings Ltd (S255)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Amend		Considers P.R22 repeats WH.R23 and as such is unnecessary.	Combine into one rule. If it is not, comments regarding WH.R23 apply.		Reject
S255.074	Woodridge Holdings Ltd (S255)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Amend		Considers P.R23 repeats WH.R24 and as such is unnecessary.	Combine into one rule. If it is not, comments regarding WH.R24 apply.		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Woodridge Holdings Ltd	FS34.043	Orogen Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Refer to Orogen submission S239.004, S239.011, S239.012 & S239.019. A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approach to earthworks provides a better outcome for industry and compliance.	Allow	Delete policy and amend associated rules.	Reject
	Woodridge Holdings Ltd	FS47.424	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Neutral	Meridian considers the restriction on winter earthworks is unreasonable and unnecessary, regardless of how the rules are organised;	Neutral	Allow S255.074 only to the extent consistent with Meridian's other requested relief on Rule P.R23 (being deletion of clause (b) and related discretionary matter (8)).	Reject
S255.075	Woodridge Holdings Ltd (S255)			9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.	Amend		Considers P.R24 repeats WH.R25 and as such is unnecessary.	Combine into one rule. If it is not, comments regarding WH.R25 apply.		Reject
	Woodridge Holdings Ltd	FS47.438	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Neutral	Meridian considers the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;	Neutral	Allow S255.075 only to the extent consistent with Meridian's requested relief (provide for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions).	Reject
S257.003	Kāinga Ora – Homes and Communities (S257)			2 Interpretation	Earthworks	Amend		Generally supports the definition as it aligns with the National Planning Standards. Clarification is sought in the related rules of Chapters 8 and 9 that exclude thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance.	Retain notified definition, subject to rules being amended to enable works associated with infrastructure. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.		Accept
S257.007	Kāinga Ora – Homes and Communities (S257)			2 Interpretation	Stabilisation	Support		Supports proposed wording.	Retain notified definition		Accept
S257.024	Kāinga Ora – Homes and Communities (S257)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Amend		Generally support this policy but questions if an accompanying technical review has been undertaken of the current GWRC Erosion and Sediment Control Guideline, and whether the practices set out within the document are capable of delivering the TSS standard under PC1. Refers to submission points against WH.P31.	Amendments sought Integrate consideration of winter works Consequential changes Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.		Reject
S257.025	Kāinga Ora – Homes and Communities (S257)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Oppose		Questions the 100g/m3 TSS standard for earthworks and what has informed this standard. Notes supporting technical reports refer to a reduction in annual sediment load of 40% per year but do not draw a connection between this target reduction and the proposed standard in PC1.	Review of and explanation of the 100g/m3 TSS standard. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.		Accept in part
S257.026	Kāinga Ora – Homes and Communities (S257)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose		Opposes this policy and the non-complying rule framework. Considers winter works can be adequately considered as a listed matter of discretion within a RDA rule, with conditions being placed accordingly to manage works during this period. Considers the framework lacks real-world practical application.	Delete the policy and consequential changes to WH.P29 and the related rule framework. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Kāinga Ora – Homes and Communities	FS11.038	GILLIES GROUP MANAGEMENT LTD	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Agrees that winter works can be adequately dealt with as a matter of discretion or via current practice.	Allow	Support submission point in full	Accept
	Kāinga Ora – Homes and Communities	FS30.036	Pukerua Holdings Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Agrees that winter works can be adequately dealt with as a matter of discretion or via current practice.	Allow	Support submission point in full	Accept
	Kāinga Ora – Homes and Communities	FS29.006	Peka Peka Farm Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	PPFL considers that winter earthworks can be appropriately managed and should not be subject to a resource consent requirement.	Allow	S260.007 in its entirety.	Accept
	Kāinga Ora – Homes and Communities	FS48.019	Ministry of Housing and Urban Development (HUD)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Concerned policy reads more like a rule or standard rather than outlining how an objective will be implemented. Consider that a blanket exclusion to winter earthworks is too blunt an approach that will impose significant costs to developments. An effects management approach that can consider the likely risk of the site (such as topography, slope, soil type, scale and duration of the work) is more appropriate. High rainfall events can occur at any time of year and a blanket ban of winter earthworks does not recognise or manage this.	Allow	Delete the policy and consequential changes to WH.P29 and the related rule framework.	Accept
	Kāinga Ora – Homes and Communities	FS47.196	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S257.026 by deleting Policy WH.P31.	Accept
S257.036	Kāinga Ora – Homes and Communities (S257)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Oppose		Broadly supports the intent of this rule (as amended by Clause 16), but oppose WH.R23(c)(iv) as it is not practical or achievable to avoid all discharge from the site.	Delete WH.R23(c)(iv) Include an exclusion within the rule that exempts activities associated with the trenching of services – i.e. thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.		Reject
	Kāinga Ora – Homes and Communities	FS20.060	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Transpower considers the exemptions sought for trenching of services better recognises and provides for trenching of services that may be associated with the maintenance, upgrading, or development of regionally significant infrastructure. With respect to the request to delete clause (c)(iv) from rule WH.R23, this request is consistent with the decision requested by Transpower in its submission.	Allow	Transpower supports the request to exempt activities associated with the trenching of services from earthworks rule WH.R23. Transpower supports the request to delete clause (c)(iv) from rule WH.R23.	Reject
	Kāinga Ora – Homes and Communities	FS48.033	Ministry of Housing and Urban Development (HUD)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support in part	Support an exemption for the trenching so that infrastructure provision and maintenance is permitted. Agree with the submitter that (c)(iv) is too restrictive (an absolute avoidance of any runoff will be extremely difficult to comply with) and should be deleted but also consider that the permitted activity status can still have a requirement for sedimentation controls and that this could include something similar to the total suspended solids limits in WH.R24(a)	Allow in part	Delete WH.R23(c)(iv). Include an exclusion within the rule that exempts activities associated with the trenching of services - i.e. thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance.	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S257.037	Kāinga Ora – Homes and Communities (S257)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Oppose		Questions the 100g/m3 TSS standard for earthworks and seek clarification as to what has informed this standard. Notes the supporting technical reports refer to a reduction in annual sediment load of 40% per year but do not draw a connection between this target reduction and the proposed standard in PC1. Opposes the condition in the rule at WH.R24(b) as it places a restriction on earthworks between 1st of June and 30th September and the resulting escalation to a non-complying activity.	Delete the condition in the rule at WH.R24(b) where it places a restriction on earthworks between 1st of June and 30th September and the resulting escalation to a non-complying activity. Instead, include winter works as a matter of discretion within the relevant RDA rule. Include an exclusion within the rule that exempts activities associated with the trenching of services – i.e. thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.		Reject
	Kāinga Ora – Homes and Communities	FS20.061	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Transpower considers the exemptions sought for trenching of services better recognises and provides for trenching of services that may be associated with the maintenance, upgrading, or development of regionally significant infrastructure. With respect to the request to delete clause (b) and provide for winter earthworks as a matter of discretion under the relevant restricted discretionary activity rule, this request is general consistent with the decisions requested by Transpower in its submission.	Allow	Transpower supports the request to exempt activities associated with the trenching of services from earthworks rule WH.R24. Transpower supports the request to delete clause (b) (which relates to the winter shut-down of earthworks) and provide for winter earthworks as a matter of discretion under the relevant restricted discretionary activity rule.	Reject
	Kāinga Ora – Homes and Communities	FS48.034	Ministry of Housing and Urban Development (HUD)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Oppose the blanket exclusion around winter earthworks and consider that potential effects can be adequately managed as a restricted discretionary activity. A blanket exclusion to winter earthworks is too blunt an approach that will impose significant costs to developments. An effects management approach that can consider the likely risk of the site (such as topography, slope, soil type, scale and duration of the work) is more appropriate. High rainfall events can occur at any time of year and a blanket ban of winter earthworks does not recognise or manage this.	Allow	Delete WH.R25 with consideration of winter works being a listed matter of discretion under WH.R24. Delete the condition in the rule at WH.R24(b) where it places a restriction on earthworks between 1st of June and 30th September and the resulting escalation to a non-complying activity. Instead, include winter works as a matter of discretion within the relevant RDA rule. Include an exclusion within the rule that exempts activities associated with the trenching of services - i.e. thrusting, boring, trenching or mole ploughing	Reject
	Kāinga Ora – Homes and Communities	FS47.285	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S257.037 and delete related discretionary matter (8).	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					discretionary activity.						
S257.038	Kāinga Ora – Homes and Communities (S257)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.	Oppose		Opposes the non-complying rule insofar as it relates to winter works.	Delete WH.R25 with consideration of winter works being a listed matter of discretion under WH.R24. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.		Reject
	Kāinga Ora – Homes and Communities	FS11.044	GILLIES GROUP MANAGEMENT LTD	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Support	Agrees that winter works can be dealt with as a matter of discretion not a separate non-complying activity rule.	Allow	Support submission point in full	Reject
	Kāinga Ora – Homes and Communities	FS30.042	Pukerua Holdings Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Support	Agrees that winter works can be dealt with as a matter of discretion not a separate non-complying activity rule.	Allow	Support submission point in full	Reject
	Kāinga Ora – Homes and Communities	FS20.062	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Support	This request is general consistent with the decisions requested by Transpower in its submission.	Allow	Transpower supports the request to delete earthworks rule WH.R25 (non-complying activity rule for earthworks), and instead provide for the consideration of winter earthworks as a matter of discretion under the relevant restricted discretionary activity rule.	Reject
	Kāinga Ora – Homes and Communities	FS48.035	Ministry of Housing and Urban Development (HUD)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Support	Oppose the blanket exclusion around winter earthworks and consider that potential effects can be adequately managed as a restricted discretionary activity. A blanket exclusion to winter earthworks is too blunt an approach that will impose significant costs to developments. An effects management approach that can consider the likely risk of the site (such as topography, slope, soil type, scale and duration of the work) is more appropriate. High rainfall events can occur at any time of year and a blanket ban of winter earthworks does not recognise or manage this.	Allow	Delete WH.R25 with consideration of winter works being a listed matter of discretion under WH.R24. Delete the condition in the rule at WH.R24(b) where it places a restriction on earthworks between 1st of June and 30th September and the resulting escalation to a non-complying activity. Instead, include winter works as a matter of discretion within the relevant RDA rule. Include an exclusion within the rule that exempts activities associated with the trenching of services - i.e. thrusting, boring, trenching or mole ploughing	Reject
	Kāinga Ora – Homes and Communities	FS47.300	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Support in part	Meridian agrees the non-complying activity status is onerous and unnecessary, including for non-compliance with the winter works restriction, and considers the default rule should be discretionary activity;	Allow in part	Allow S257.038 by providing for winter earthworks as a restricted discretionary activity, subject to effects based	Reject



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										conditions, with a discretionary activity default rule for non-compliance with conditions.	
S257.052	Kāinga Ora – Homes and Communities (S257)			9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Amend		Generally support this policy but questions if an accompanying technical review has been undertaken of the current GWRC Erosion and Sediment Control Guideline, and whether the practices set out within the document are capable of delivering the TSS standard under PC1. Refers to submission points against P.P29	Integrate consideration of winter works Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.		Accept in part
S257.053	Kāinga Ora – Homes and Communities (S257)			9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Amend		Questions the 100g/m3 TSS standard for earthworks and what has informed this standard. Notes supporting technical reports refer to a reduction in annual sediment load of 40% per year but do not draw a connection between this target reduction and the proposed standard in PC1.	Not stated		Accept
S257.054	Kāinga Ora – Homes and Communities (S257)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose		Opposes this policy and the non-complying rule framework. Considers winter works can be adequately considered as a listed matter of discretion within a RDA rule, with conditions being placed accordingly to manage works during this period. Considers the framework lacks real-world practical application.	Delete the policy and consequential changes to WH.P29 and the related rule framework. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.		Accept
	Kāinga Ora – Homes and Communities	FS11.046	GILLIES GROUP MANAGEMENT LTD	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Agrees that winter works can be dealt with as a matter of discretion not a separate non-complying activity rule.	Allow	Support submission point in full	Accept
	Kāinga Ora – Homes and Communities	FS16.177	Woodridge Holdings Ltd	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Not stated	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. 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.	Allow	Delete policy and make earthworks greater than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	Kāinga Ora – Homes and Communities	FS30.044	Pukerua Holdings Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Agrees that winter works can be dealt with as a matter of discretion not a separate non-complying activity rule.	Allow	Support submission point in full	Accept
	Kāinga Ora – Homes and Communities	FS28.101	Waka Kotahi NZ Transport Agency	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Winter works can be more appropriately managed through a consent process.	Allow	Not stated	Accept
	Kāinga Ora – Homes and Communities	FS48.043	Ministry of Housing and Urban Development (HUD)	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Consider that a blanket exclusion to winter earthworks is too blunt an approach that will impose significant costs to developments. An effects management approach that can consider the likely risk of the site (such as topography, slope soil type, scale and duration of the work) is more appropriate. High rainfall events can occur at any time of year and a blanket ban of winter earthworks does not recognise or manage this.	Allow	Delete the policy and consequential changes to WH.P29 and the related rule framework.	Accept
	Kāinga Ora – Homes and Communities	FS47.343	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S257.054 by deleting Policy P.P29.	Accept
S257.064	Kāinga Ora – Homes and			9 Te Awarua-o-	Rule P.R22: Earthworks –	Oppose		Broadly supports the intent of this rule (as amended by Clause 16), but oppose P.R22(c)(iv) as it is not	Delete P.R22(c)(iv) Include an exclusion within the rule that exempts activities associated with the		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Communities (S257)			Porirua Whaitua	permitted activity.			practical or achievable to avoid all discharges from the site.	trenching of services – i.e. thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.		
	Kāinga Ora – Homes and Communities	FS11.051	GILLIES GROUP MANAGEMENT LTD	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Agrees that an exclusion needs to be added to the earthworks permitted activity rule that exempts activities associated with the trenching of services.	Allow	Support submission point in full	Reject
	Kāinga Ora – Homes and Communities	FS16.228	Woodridge Holdings Ltd	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Not stated	Subclause (g) cannot be met as you cannot guarantee that no sediment will leave the site or enter a waterbody, and that sediment is already managed by subclause (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 lower rates, even when the earthworks area is stabilised. No earthworks will meet the permitted activity criteria, regardless of size and treatment.	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.”  Amend Items (c)(1v) and (c)(v) so that they allow an appropriate level of SS in any stormwater discharge	Accept in part
	Kāinga Ora – Homes and Communities	FS30.049	Pukerua Holdings Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Agrees that an exclusion needs to be added to the earthworks permitted activity rule that exempts activities associated with the trenching of services.	Allow	Support submission point in full	Reject
	Kāinga Ora – Homes and Communities	FS20.068	Transpower New Zealand Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Transpower considers the exemptions sought for trenching of services better recognises and provides for trenching of services that may be associated with the maintenance, upgrading, or development of regionally significant infrastructure. With respect to the request to delete clause (c)(iv) from rule P.R22, this request is consistent with the decision requested by Transpower in its submission.	Allow	Transpower supports the request to exempt activities associated with the trenching of services from earthworks rule P.R22. Transpower supports the request to delete clause (c)(iv) from rule P.R22.	reject
S257.065	Kāinga Ora – Homes and Communities (S257)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Oppose		Questions the 100g/m3 TSS standard for earthworks and seek clarification as to what has informed this standard. Notes the supporting technical reports refer to a reduction in annual sediment load of 40% per year but do not draw a connection between this target reduction and the proposed standard in PC1. Opposes the condition in the rule at P.R23(b) as it places a restriction on earthworks between 1st of June and 30th September and the resulting escalation to a non-complying activity.	Delete the condition in the rule at P.R23(b) where it places a restriction on earthworks between 1st of June and 30th September and the resulting escalation to a non-complying activity. Instead, include winter works as a matter of discretion within the relevant RDA rule. Include an exclusion within the rule that exempts activities associated with the trenching of services – i.e. thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.		Reject
	Kāinga Ora – Homes and Communities	FS11.052	GILLIES GROUP MANAGEMENT LTD	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Agrees that winter works can be dealt with as a matter of discretion not a separate non-complying activity rule.	Allow	Support submission point in full	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Kāinga Ora – Homes and Communities	FS30.050	Pukerua Holdings Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Agrees that winter works can be dealt with as a matter of discretion not a separate non-complying activity rule.	Allow	Support submission point in full	Reject
	Kāinga Ora – Homes and Communities	FS20.069	Transpower New Zealand Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Transpower considers the exemptions sought for trenching of services better recognises and provides for trenching of services that may be associated with the maintenance, upgrading, or development of regionally significant infrastructure. With respect to the request to delete clause (b) and provide for winter earthworks as a matter of discretion under the relevant restricted discretionary activity rule, this request is general consistent with the decisions requested by Transpower in its submission.	Allow	Transpower supports the request to exempt activities associated with the trenching of services from earthworks rule P.R23. Transpower supports the request to delete clause (b) (which relates to the winter shut-down of earthworks) and provide for winter earthworks as a matter of discretion under the relevant restricted discretionary activity rule.	Reject
	Kāinga Ora – Homes and Communities	FS48.054	Ministry of Housing and Urban Development (HUD)	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Oppose the blanket exclusion around winter earthworks and consider that potential effects can be adequately managed under as a restricted discretionary activity. Winter is not the only time that heavy rainfall events occur and the provisions around the risks of earthworks should take the characteristics of the site and any mitigation proposed to manage the risks into account.	Allow	Delete P.R24 with consideration of winter works being a listed matter of discretion under P.R23. Delete the condition in the rule at P.R23(b) where it places a restriction on earthworks between 1st of June and 30th September and the resulting escalation to a non-complying activity. Instead, include winter works as a matter of discretion within the relevant RDA rule. Include an exclusion within the rule that exempts activities associated with the trenching of services - i.e. thrusting, boring, trenching or mole ploughing	Reject
	Kāinga Ora – Homes and Communities	FS47.425	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S257.065 and delete related discretionary matter (8).	Reject
S257.066	Kāinga Ora – Homes and Communities (S257)			9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.	Oppose		Opposes the non-complying rule insofar as it relates to winter works.	Delete P.R24 with consideration of winter works being a listed matter of discretion under P.R23. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.		Reject
	Kāinga Ora – Homes and Communities	FS20.070	Transpower New Zealand Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-		Support	This request is general consistent with the decisions requested by Transpower in its submission.	Allow	Transpower supports the request to delete earthworks rule P.R24 (non-complying activity)	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					complying activity.					rule for earthworks), and instead provide for the consideration of winter earthworks as a matter of discretion under the relevant restricted discretionary activity rule.	
	Kāinga Ora – Homes and Communities	FS28.103	Waka Kotahi NZ Transport Agency	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Support	Winter works can be more appropriately managed through a consent process.	Allow	Not stated	Reject
	Kāinga Ora – Homes and Communities	FS48.055	Ministry of Housing and Urban Development (HUD)	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Support	Oppose the blanket exclusion around winter earthworks and consider that potential effects can be adequately managed under as a restricted discretionary activity. Winter is not the only time that heavy rainfall events occur and the provisions around the risks of earthworks should take the characteristics of the site and any mitigation proposed to manage the risks into account.	Allow	Delete P.R24 with consideration of winter works being a listed matter of discretion under P.R23. Delete the condition in the rule at P.R23(b) where it places a restriction on earthworks between 1st of June and 30th September and the resulting escalation to a non-complying activity. Instead, include winter works as a matter of discretion within the relevant RDA rule. Include an exclusion within the rule that exempts activities associated with the trenching of services - i.e. thrusting, boring, trenching or mole ploughing	Reject
S258.023	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies (S258)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		Clause (c)(iv) sets a zero tolerance approach to any sediment content in stormwater runoff during earthworks. The requirement to entirely prevent silt or sediment from entering the stormwater system is considered too absolute and unlikely to be able to be achieved in all situations even where best practice silt and sediment control measures are in place. This approach is likely to generate high consenting costs that are not reflective of the level of potential contaminants generated by small-scale earthworks that are well managed in accordance with best practice erosion and sediment control measures, or the additional benefits, in terms of sediment reduction, that might be achieved by requiring a consent to be obtained. Suggests a more appropriate approach is considered to be to require implementation of best practice erosion and sediment control measures to reduce the risk of sediment becoming entrained in stormwater.	Amend Rule WH.23(c)(iv) to focus on implementation of best practice erosion and sediment control measures rather than the absolute avoidance approach currently proposed. This could be achieved by making the following changes or changes to the same effect:  Rule WH.R23: Earthworks – permitted activity Earthworks is a permitted activity, provided the following conditions are met:  a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or b) the earthworks are to implement an action in the farm environment plan for the farm, or c) the area of earthworks does not exceed 3,000m <sup>2</sup> per property in any consecutive 12-month period, and (i) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									with Rules R122, R124, R130, R131, R134, R135, and R137, and (ii) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (iii) the area of earthworks must be stabilised within six months after completion of the earthworks, and (iv) best practice erosion and sediment control measures shall be used to minimise the risk of a discharge there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (v) best practice erosion and sediment control measures shall be used to minimise the risk of prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).		
	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	FS47.259	Meridian Energy Limited	8 Whaitua Te Whanganui- a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support in part	Meridian agrees that clause (g) is impractical, unachievable and unreasonable and should be deleted;	Allow in part	Allow S258.023 by deleting clause (g).	Reject
S258.024	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies (S258)			8 Whaitua Te Whanganui- a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		Notes Rule WH.R24 requires a concentration of no more than 100mg/L of total suspended solids (TSS) in discharges from earthworks, with a default to non-complying activity status (under Rule WH.25) where that threshold cannot be achieved. Considers a broad range of variables will affect sediment loading in discharges from earthworks including soil types, slope length and angle, rain events and intensity during an earthworks project, as well as the nature scale and duration of the earthworks involved. The ability to achieve and clearly demonstrate the ability to comply with a specified TSS threshold may not be known prior to the commencement of any given earthworks project. Consider a more practicable approach would be to require implementation of best practice erosion and sediment control measures to reduce the risk of sediment becoming entrained in stormwater as part of a restricted discretionary activity consenting process under WH.R24. Considers there is unlikely to be any significant benefit in requiring a non-complying activity consent, rather than a restricted discretionary activity consent, where there is uncertainty around the ability to comply with the specified 100mg/L TSS threshold at all times (for example where an intense rainfall event may occur), and there is an ability for council to review, impose conditions and monitor proposed erosion and sediment control measures through the RD consent process in any case.	Amend Rule WH.R24, to focus on implementation of best practice erosion and sediment control measures rather requiring compliance with a sediment loading threshold. This could be achieved by making the following changes or changes to the same effect: Rule WH.R24: Earthworks – restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) best practice erosion and sediment control measures shall be used to minimise the risk of a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3,		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (iii) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (iv) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year.		
	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	FS47.286	Meridian Energy Limited	8 Whaitua Te Whanganui- a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose in part	Meridian considers the clause (b) restriction on winter earthworks is unreasonable and unnecessary;	Disallow in part	Disallow S258.024 in part by deleting clause (b) and related discretionary matter (8).	Reject
S258.025	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies (S258)			8 Whaitua Te Whanganui- a-Tara	Rule WH.R25: Earthworks – non- complying activity.	Support		Supports Rule WH.R25, subject to the changes sought to Rule WH.R24.	Retain Rule WH.R2 as notified.		Reject
S258.044	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies (S258)			9 Te Awarua-o- Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Amend		Clause (c)(iv) sets a zero tolerance approach to any sediment content in stormwater runoff during earthworks. The requirement to entirely prevent silt or sediment from entering the stormwater system is considered too absolute and unlikely to be able to be achieved in all situations even where best practice silt and sediment control measures are in place. This approach is likely to generate high consenting costs that are not reflective of the level of potential contaminants generated by small-scale earthworks that are well managed in accordance with best practice erosion and sediment control measures, or the additional benefits, in terms of sediment reduction, that might be achieved by requiring a consent to be obtained. Suggests a more appropriate approach is to require implementation of best practice erosion and sediment control measures to reduce the risk of sediment becoming entrained in stormwater.	Amend Rule P.22(c)(iv) and (v) to focus on implementation of best practice erosion and sediment control measures rather than the absolute avoidance approach currently proposed. This could be achieved by making the following changes or changes to the same effect:  Rule P.R22: Earthworks – permitted activity Earthworks is a permitted activity, provided the following conditions are met: a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or b) the earthworks are to implement an action in the farm environment plan for the farm, or c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (i) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (ii) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (iii) the area of earthworks must be stabilised within six months after completion of the earthworks, and (iv) best practice erosion and sediment control measures shall be used to		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									<p>minimise the risk of a discharge there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and</p> <p>(v) best practice erosion and sediment control measures shall be used to minimise the risk of prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).</p>		
	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	FS28.094	Waka Kotahi NZ Transport Agency	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Current wording requires 'no discharge' (P.R22(c)(iv)) and 'prevent a discharge' (P.R22(c)(v)) which is likely unachievable.	Allow	Not stated	Accept in part
	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	FS47.399	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support in part	Meridian agrees that clause (g) is impractical, unachievable and unreasonable and should be deleted;	Allow in part	Allow S258.044 by deleting clause (g).	Reject
S258.045	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies (S258)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Amend		<p>Notes Rule WH.R24 requires a concentration of no more than 100mg/l of total suspended solids (TSS) in discharges from earthworks, with a default to non-complying activity status (under Rule WH.25) where that threshold cannot be achieved. Considers a broad range of variables will affect sediment loading in discharges from earthworks including soil types, slope length and angle, rain events and intensity during an earthworks project, as well as the nature scale and duration of the earthworks involved. The ability to achieve and clearly demonstrate the ability to comply with a specified TSS threshold may not be known prior to the commencement of any given earthworks project. Suggests a more practicable approach would be to require implementation of best practice erosion and sediment control measures to reduce the risk of sediment becoming entrained in stormwater as part of a restricted discretionary activity consenting process under WH.R24. Considers there is unlikely to be any significant benefit in requiring a non-complying activity consent, rather than a restricted discretionary activity consent, where there is uncertainty around the ability to comply with the specified 100mg/l TSS threshold at all times (for example where an intense rainfall event may occur), and there is an ability for council to review, impose conditions and monitor proposed erosion and sediment control measures through the RD consent process in any case.</p>	<p>Amend Rule P.R23, to focus on implementation of best practice erosion and sediment control measures rather requiring compliance with a sediment loading threshold. This could be achieved by making the following changes or changes to the same effect:</p> <p>Rule P.R23: Earthworks – restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule P.R22 is a restricted discretionary activity, provided the following conditions are met: (a) best practice erosion and sediment control measures shall be used to minimise the risk of a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network. the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall</p>		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (iii) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (iv) 30% in any other river, and (c) earthworks shall not occur between 1st June and 30th September in any year.		
	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	FS28.095	Waka Kotahi NZ Transport Agency	9 Te Awarua-o- Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Change focuses on best practice mitigation.	Allow	Not stated	Accept
	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	FS47.426	Meridian Energy Limited	9 Te Awarua-o- Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Oppose in part	Meridian considers the clause (b) restriction on winter earthworks is unreasonable and unnecessary;	Disallow in part	Disallow S258.045 in part by deleting clause (b) and related discretionary matter (8).	Reject
S258.046	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies (S258)			9 Te Awarua-o- Porirua Whaitua	Rule P.R24: Earthworks – non- complying activity.	Support		Supports Rule P.R24, subject to the changes sought to Rule P.R23	Retain Rule P.R24 as notified.		Reject
	BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	FS47.439	Meridian Energy Limited	9 Te Awarua-o- Porirua Whaitua	Rule P.R24: Earthworks – non- complying activity.		Oppose	Meridian considers the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;	Disallow	Disallow S258.046 and provide for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.	Reject
S26.009	Christine Stanley (S26)			2 Interpretation	Earthworks	Amend		Amend to allow gardening, cultivation and fence maintenance, to avoid unintended interpretation.	Amend 2.2: Earthworks - to allow gardening, cultivation and fence maintenance, to avoid unintended interpretation.		Reject
S26.016	Christine Stanley (S26)			9 Te Awarua-o- Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Not Stated		Earthwork provisions do not allow for stabilisation and access track maintenance between June-September	Delete P.P29		Accept in part
	Christine Stanley	FS47.323	Meridian Energy Limited	9 Te Awarua-o- Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S26.016.	Accept
	Christine Stanley	FS12.9	Diane Strugnell	9 Te Awarua-o- Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	The winter months, as identified in PP29, are not necessarily those with highest rainfall events. High rainfall events in the summer months, following a dry period when they are often least expected, can result in much higher levels of sediment being washed off compared to during the winter months.	Allow	As per submission	Accept
S260.007	Cannon Point Development Limited (Ltd.) (S260)			8 Whaitua Te Whanganui- a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose		Opposes the winter shut down period for earthworks over 3,000m2 as the requirements are onerous and will delay developments, result in unnecessary costs and are not required with the standards set in Policy WH.P30 and included in the rules. Considers that winter works are appropriate to be undertaken if the soil type provides for this and sufficient management of earthworks controls are provided to manage	Delete policy WH.P31.		Accept



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								effects, and/or a contractor has demonstrated they can work effectively in these conditions and the project requires works in this period. Considers the operational performance standard should be deleted as a policy because it should be site specific.			
	Cannon Point Development Limited (Ltd.)	FS23.010	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Cannon Point Development Limited (Ltd.)	FS29.001	Peka Peka Farm Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	PPFL considers that winter earthworks can be appropriately managed and should not be subject to an additional resource consent requirement.	Allow	S260.007 in its entirety.	Accept
	Cannon Point Development Limited (Ltd.)	FS47.197	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S260.007 by deleting Policy WH.P31.	Accept
S260.016	Cannon Point Development Limited (Ltd.) (S260)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		Notes an error with rule wording and that GWRC relayed the intention of this rule is to provide for all earthworks less than 3000m2 per property as a permitted activity, subject to conditions, and will look to correct this error through Clause 16 of the RMA or a submission. Opposes the earthworks rule as it stands and supports any amendment to the Rule to provide for all earthworks where they do not exceed 3000m2 per property in any consecutive 12 month period as a permitted activity.	Amend Rule WH.R23 as follows:  Earthworks is a permitted activity, provided the following conditions are met: (a) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, or (a) (b) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) (c) the earthworks are to implement an action in the farm environment plan for the farm, and (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, And (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									marine area, including via a stormwater network.		
	Cannon Point Development Limited (Ltd.)	FS23.019	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S260.017	Cannon Point Development Limited (Ltd.) (S260)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		Opposes the shut down period for earthworks included in condition (b) and mater of discretion (8) restricting winter works and preparation for closedown for reasons outlined in submission on Policy WH.P31, subject to the acceptance of amendments to Rule WH.R23 as sought above.	Amend Rule WH.R24 as follows:  Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (iii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year. Matters for discretion 1. The location, area, scale, volume, duration and staging and timing of works 2. The design and suitability of erosion of sediment control measures including consideration of hazard mitigation and the risk of accelerated soil erosion associated the staging of works and progressive stabilisation 3. The placement and treatment of stockpiled materials on the site, including requirements to remove material if it is not to be reused on the site 4. The proportion of unstabilised land in the catchment 5. The adequacy and efficiency of stabilisation devices for sediment control 6. Any adverse effects on: (i) groundwater, surface water bodies and their margins, particularly surface		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									<p>water bodies within sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori customary use) or Schedule I (important trout fishery rivers and spawning waters)</p> <p>(ii) group drinking water supplies and community drinking water supplies</p> <p>(iii) mauri, water quality (including water quality in the coastal marine area), aquatic and marine ecosystem health, aquatic and riparian habitat quality, indigenous biodiversity values, mahinga kai and critical life cycle periods for indigenous aquatic species (iv) (iv) the natural character of lakes, rivers, natural wetlands and their margins and the coastal environment (v) natural hazards, land stability, soil erosion, sedimentation and flood hazard management including the use of natural buffers 7. Duration of the consent</p> <p>8. Preparation required for the close-down period (from 1st June to 30th September each year) and any maintenance activities required during this period</p> <p>9. Monitoring and reporting requirements</p>		
	Cannon Point Development Limited (Ltd.)	FS23.020	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
	Cannon Point Development Limited (Ltd.)	FS29.002	Peka Peka Farm Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	PPFL considers that winter earthworks can be appropriately managed and should not be restricted.	Allow	S260.017 in its entirety.	Reject
	Cannon Point Development Limited (Ltd.)	FS47.287	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Meridian agrees the rule should provide for associated discharges and agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S260.017.	Reject
S261.014	Forest & Bird (S261)			2 Interpretation	Earthworks	Not Stated		Seeks full text is referenced to assist plan users.	Include full text of definition of earthworks (from the NES). Any further consequential or alternative relief as may be necessary and appropriate to address concerns.		Reject
	Forest & Bird	FS9.341	New Zealand Farm Forestry Association (NZFFA)	2 Interpretation	Earthworks		Oppose	Not stated	Disallow	Not stated	Accept
	Forest & Bird	FS27.633	Manor Park and Haywards	2 Interpretation	Earthworks		Support	Our natural environment should be protected or improved where it is degraded or risks being	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
			Residents Community Incorporate ("MPHRCI")					degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S261.090	Forest & Bird (S261)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Amend		Considers setback distances from waterways (of 10m or more) are an effective method of ensuring fine sediment particles from earthworks are removed.	Add new clause: (x) requiring setback distances, of no less than 10 metres, from surface water bodies, ephemeral watercourses, and the coastal marine area.  Any further consequential or alternative relief as may be necessary and appropriate to address concerns.		Reject
	Forest & Bird	FS1.047	Horticulture New Zealand	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Oppose	Setbacks are managed through district plans.	Disallow	Disallow.	Accept
	Forest & Bird	FS8.022	Winstone Aggregates	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Oppose	Winstone oppose increasing the setback. The setback provided in the notified rule is consistent with the setback for earthworks provided for in the operative NRP. It is unclear what setback is requested by the submitter, and what justification there is for any increased setback. Winstone oppose including reference to 'ephemeral watercourses'. The definition of 'ephemeral watercourse' in the NRP is very broad and would include gullies and indents in landscapes, all of which are not mapped or easily defined. This would result in significant constraints for undertaking earthworks on any sloping land.	Disallow	Winstone seek that relief sought is not allowed.	Accept
	Forest & Bird	FS25.037	Guildford Timber Company	8 Whaitua Te	Policy WH.P29: Management		Oppose	The need to require setback distances is not required in the NRP as the NES-FM and NES-CF already addresses this matter	Disallow	Retain the wording of Policy WH.P29 as notified	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
			Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	Whanganui-a-Tara	of earthworks.						
	Forest & Bird	FS9.417	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Oppose	Not stated	Disallow	Not stated	Accept
	Forest & Bird	FS20.027	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Oppose	With respect to the setback requested, the setback provided in the notified plan change is consistent with the setback for earthworks provided for in the operative NRP. It is unclear what justification there is for any increased setback (of no less than 10m) With respect to ephemeral watercourses, Transpower opposes references to ephemeral watercourses in the policy on the basis that they are typically not mapped and, in practice, difficult to clearly define. This introduces significant uncertainty into the scope and spatial application of the policy.	Disallow	Transpower opposes the request to amend policy WH.P29 to increase setback distances for earthworks and refer to ephemeral watercourses.	Accept
	Forest & Bird	FS27.709	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part
	Forest & Bird	FS45.029	Kāinga Ora – Homes and Communities	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Oppose	Kāinga Ora considers that this clause reads as a rule and not a policy. In addition, setbacks to water bodies etc should be nuanced in regard to the type of water body and the manner in which sediment controls are	Disallow	Considers setback distances from waterways (of 10m or more) are an effective method of	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								provided. A blanket policy arm is not considered appropriate.		ensuring fine sediment particles from earthworks are removed.  Add new clause:(x) requiring setback distances, of no less than 10 metres, from surface water bodies, ephemeral watercourses, and the coastal marine area. Any further consequential or alternative relief as may be necessary and appropriate to address concerns	
	Forest & Bird	FS31.057	Wellington International Airport Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Oppose	The proposed amendments do not recognise that in some circumstances, earthworks may be required within or directly or directly adjacent to waterbodies (fresh and coastal). It is also not clear what policy directive such activities would subsequently be considered under.	Disallow	Add new clause:(x) requiring setback distances, of no less than 10 metres, from surface water bodies, ephemeral watercourses, and the coastal marine area. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.	Reject
S261.091	Forest & Bird (S261)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Amend		Considers controls on deposited sediment are also required	Amend to include new clause: (e) the discharge shall not, after the zone of reasonable mixing, result in: (i) a change in deposited sediment cover of more than 20%, or (ii) an increase in deposited sediment to be more than 20% of the bed  Any further consequential or alternative relief as may be necessary and appropriate to address concerns.		Reject
	Forest & Bird	FS9.418	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Oppose	Not stated	Disallow	Not stated	Accept
	Forest & Bird	FS27.710	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
	Forest & Bird	FS28.073	Waka Kotahi NZ Transport Agency	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Oppose	Changes in sediment depth may have a range of causes including natural movement of sediment.	Disallow	Not stated	Accept
	Forest & Bird	FS45.031	Kāinga Ora – Homes and Communities	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Oppose in part	Kāinga Ora considers that this clause reads as a rule and not a policy.	Disallow in part	Considers controls on deposited sediment are also required.  Amend to include new clause: (e) the discharge shall not, after the zone of reasonable mixing, result in: (i) a change in deposited sediment cover of more than 20%, or (ii) an increase in deposited sediment to be more than 20% of the bed Any further consequential or alternative relief as may be necessary and appropriate to address concerns.	Reject
S261.092	Forest & Bird (S261)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Support		Supports reduction of sediment degrading ecosystems.	Retain as notified		Reject
	Forest & Bird	FS9.419	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Oppose	Not stated	Disallow	Not stated	Accept
	Forest & Bird	FS27.711	Manor Park and Haywards Residents Community	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports	Allow	Not stated	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
			Incorporate ("MPHRCI")					retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S261.116	Forest & Bird (S261)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Oppose		Considers a 5m setback is insufficient to protect ecosystems and maintain water quality. Considers ephemeral watercourses should be referred to as they have ecological value and can reduce contaminant loads when protected.	Amend as follows: (d) the earthworks shall not occur within, or within a 10 5m setback from, of a surface water body, ephemeral watercourse, or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e ) soil or debris from earthworks is not placed where it can enter a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, ephemeral watercourse, the coastal marine area, or onto land that may enter a surface water body, ephemeral watercourse or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network.		Reject



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									Any further consequential or alternative relief as may be necessary and appropriate to address concerns.		
	Forest & Bird	FS8.024	Winstone Aggregates	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose	Setback will result in significant constraints for development within a site. Note that this includes ephemeral waterbodies which is very broad.	Disallow	Winstone seek that relief sought is not allowed.	Accept
	Forest & Bird	FS25.043	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose	The additional standards sought by the submitter include matters already addressed in the NPS-FM and are not required in the NRP and are not necessary to implement the NES-FM or to achieve the purpose of the RMA; including reference to ephemeral watercourses is unnecessary and inappropriate	Disallow	Retain the wording of Rule WH.R23 as notified	Accept
	Forest & Bird	FS9.443	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose	Not stated	Disallow	Not stated	Accept
	Forest & Bird	FS20.032	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose in part	With respect to the setback requested, the setback provided in the notified plan change is consistent with the setback for earthworks provided for in the operative NRP. It is unclear what justification there is for any increased setback. With respect to ephemeral watercourses, Transpower opposes references to ephemeral watercourses in the rule on the basis that they are typically not mapped and, in practice, difficult to clearly define. This introduces significant uncertainty into the scope and spatial application of the rule.	Disallow in part	Transpower opposes the request to amend earthworks rule WH.R23 to increase the setback for earthworks from 5m to 10m. Transpower opposes the request to amend earthworks rule WH.R23 to refer to ephemeral watercourses.	Accept
	Forest & Bird	FS22.042	Cannon Point Development Limited (Ltd.)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose	Opposed as it is considered the 5m setback as notified is appropriate.	Disallow	Opposed as it is considered that the 5m setback, as proposed, is sufficient to protect ecosystems and maintain water quality.	Accept
	Forest & Bird	FS27.735	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community	Allow	Not stated	Accept in part

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								concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
	Forest & Bird	FS28.081	Waka Kotahi NZ Transport Agency	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose	The RMA defines "river" as being continually or intermittently flowing body of freshwater The NPS-FW and NES-FW include provisions for the management of permanent and intermittent rivers and streams. These provisions do not extend to ephemeral streams.	Disallow	Not stated	Accept
	Forest & Bird	FS45.037	Kāinga Ora – Homes and Communities	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose	Kāinga Ora consider that a 10m setback is onerous and does not differentiate between watercourse type or quality in this instance, (especially in regard to ephemeral streams). Effects can be appropriately mitigated through robust erosion and sediment controls.	Disallow	<p>Considers a 5m setback is insufficient to protect ecosystems and maintain water quality. Considers ephemeral watercourses should be referred to as they have ecological value and can reduce contaminant loads when protected.</p> <p>Amend as follows: (d) the earthworks shall not occur within, or within a 10 5m setback from, of a surface water body, ephemeral watercourse, or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e ) soil or debris from earthworks is not placed where it can enter a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body,</p>	Accept

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										ephemeral watercourse, the coastal marine area, or onto land that may enter a surface water body, ephemeral watercourse or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.	
	Forest & Bird	FS31.083	Wellington International Airport Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose	WIAL does not support an increase in the required setback to 10m. The permitted activity conditions already require, in addition to the setback, a requirement for sediment and erosion control measures to be put in place, which will effectively manage any potential discharges to any waterbody. WIAL also does not support the introduction of ephemeral water course.	Disallow	Amend as follows: (d) the earthworks shall not occur within, or within a 10 5m setback from, of a surface water body, ephemeral watercourse, or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, ephemeral watercourse, the	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										coastal marine area, or onto land that may enter a surface water body, ephemeral watercourse or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network.	
S261.117	Forest & Bird (S261)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Oppose		Considers the matters of discretion are not wide enough to ensure all adverse effects on all important ecological values are addressed.	Reclassify as a discretionary activity rule.  Any further consequential or alternative relief as may be necessary and appropriate to address concerns.		Reject
	Forest & Bird	FS8.025	Winstone Aggregates	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	Winstone oppose modifying the activity status. The restricted discretionary activity status subject to the to the conditions (notwithstanding Winstone's proposed changes) and matters of discretion appropriately manage effects. Increasing the activity status will result in further uncertainty and an unreasonably onerous consenting process.	Disallow	Winstone seek that relief sought is not allowed.	Accept
	Forest & Bird	FS25.044	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	The need to reclassify the activity status to discretionary is not necessary as the matters of discretion are robust and appropriate and will ensure the implementation of the NPS-FM and the purpose of the RMA is achieved	Disallow	Retain restricted discretionary activity status of Rule WH.R24 as notified	Accept
	Forest & Bird	FS9.444	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	Not stated	Disallow	Not stated	Accept
	Forest & Bird	FS20.033	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	Subject to the decision requested by Transpower in its submission on rule WH.R24 being allowed, Transpower considers that the matters of discretion recognise an appropriate range of potential adverse effects associated with earthworks. On this basis, Transpower considers that discretionary activity status is unjustified.	Disallow	Transpower opposes the request to amend the activity status of earthworks rule WH.R24 from restricted discretionary to discretionary.	Accept
	Forest & Bird	FS27.736	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
	Forest & Bird	FS28.083	Waka Kotahi NZ Transport Agency	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	Effects can be appropriate managed via RDA status.	Disallow	Not stated	Accept
	Forest & Bird	FS45.038	Kāinga Ora – Homes and Communities	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	Subject to the Kāinga Ora primary submission, Kāinga Ora oppose the elevation of this rule from RDA to discretionary and do not consider that additional matters of discretion are required as this is overly onerous.	Disallow	Considers the matters of discretion are not wide enough to ensure all adverse effects on all important ecological values are addressed. Reclassify as a discretionary activity rule. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.	Accept
	Forest & Bird	FS47.288	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	Restricted discretionary activity status provides sufficient rigour to address likely environmental effects;	Disallow	Disallow S261.117.	Accept
S261.118	Forest & Bird (S261)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.	Support		Supports consistency with the purpose of the RMA, in conjunction with relief sought by the submitter.	Retain as notified		Reject
	Forest & Bird	FS9.445	New Zealand Farm Forestry Association (NZFFA)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-		Oppose	Not stated	Disallow	Not stated	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Forest & Bird	FS27.737	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	complying activity. Rule WH.R25: Earthworks – non-complying activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part
S261.169	Forest & Bird (S261)			9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Amend		Considers setback distances from waterways (of 10m or more) are an effective method of ensuring fine sediment particles from earthworks are removed.	Add new clause: (x) requiring setback distances, of no less than 10 metres, from surface water bodies, ephemeral watercourses, and the coastal marine area.  Any further consequential or alternative relief as may be necessary and appropriate to address concerns.		Reject
	Forest & Bird	FS1.070	Horticulture New Zealand	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.		Oppose	Setbacks are managed through district plans.	Disallow	Disallow.	Reject
	Forest & Bird	FS9.496	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.		Oppose	Not stated	Disallow	Not stated	Accept
	Forest & Bird	FS20.043	Transpower New Zealand Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of		Oppose	With respect to the setback requested, the setback provided in the notified plan change is consistent with the setback for earthworks provided for in the operative NRP. It is unclear what justification there is	Disallow	Transpower opposes the request to amend policy P.P27 to increase setback	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					earthworks sites.			for any increased setback. With respect to ephemeral watercourses, Transpower opposes references to ephemeral watercourses in the policy on the basis that they are typically not mapped and, in practice, difficult to clearly define. This introduces significant uncertainty into the scope and spatial application of the policy.		distances for earthworks and refer to ephemeral watercourses.	
	Forest & Bird	FS27.788	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part
	Forest & Bird	FS45.030	Kāinga Ora – Homes and Communities	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.		Oppose	Kāinga Ora considers that this clause reads as a rule and not a policy. In addition, setbacks to water bodies etc should be nuanced in regard to the type of water body and the manner in which sediment controls are provided. A blanket policy arm is not considered appropriate.	Disallow	Considers setback distances from waterways (of 10m or more) are an effective method of ensuring fine sediment particles from earthworks are removed.  Add new clause:(x) requiring setback distances, of no less than 10 metres, from surface water bodies, ephemeral watercourses, and the coastal marine area. Any further consequential or alternative relief as	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										may be necessary and appropriate to address concerns	
S261.170	Forest & Bird (S261)			9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Amend		Considers controls on deposited sediment are also required.	Include new clause: (e) the discharge shall not, after the zone of reasonable mixing, result in: (i) a change in deposited sediment cover of more than 20%, or (ii) an increase in deposited sediment to be more than 20% of the bed  Any further consequential or alternative relief as may be necessary and appropriate to address concerns.		Reject
	Forest & Bird	FS9.497	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.		Oppose	Not stated	Disallow	Not stated	Accept
	Forest & Bird	FS27.789	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part
	Forest & Bird	FS28.074	Waka Kotahi NZ Transport Agency	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.		Oppose	Changes in sediment depth may have a range of causes including natural movement of sediment.	Disallow	Not stated	Accept



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Forest & Bird	FS45.032	Kāinga Ora – Homes and Communities	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.		Oppose in part	Kāinga Ora considers that this clause reads as a rule and not a policy.	Disallow in part	Considers controls on deposited sediment are also required.  Amend to include new clause: (e) the discharge shall not, after the zone of reasonable mixing, result in: (i) a change in deposited sediment cover of more than 20%, or (ii) an increase in deposited sediment to be more than 20% of the bed Any further consequential or alternative relief as may be necessary and appropriate to address concerns.	Accept
S261.171	Forest & Bird (S261)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Amend		Supports reduction of sediment degrading ecosystems.	Retain as notified		Reject
	Forest & Bird	FS9.498	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Oppose	Not stated	Disallow	Not stated	Accept
	Forest & Bird	FS27.790	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly,	Allow	Not stated	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S261.193	Forest & Bird (S261)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Oppose		Considers a 5m setback is insufficient to protect ecosystems and maintain water quality. Considers ephemeral watercourses should be referred to as they have ecological value and can reduce contaminant loads when protected.	Amend as follows: (d) the earthworks shall not occur within, or within a 10 5m setback from, of a surface water body, ephemeral watercourse, or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e ) soil or debris from earthworks is not placed where it can enter a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, ephemeral watercourse, the coastal marine area, or onto land that may enter a surface water body, ephemeral watercourse or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network.  Any further consequential or alternative relief as may be necessary and appropriate to address concerns.		Reject
	Forest & Bird	FS9.520	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Oppose	Not stated	Disallow	Not stated	Accept
	Forest & Bird	FS20.049	Transpower New Zealand Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Oppose in part	With respect to the setback requested, the setback provided in the notified plan change is consistent with the setback for earthworks provided for in the operative NRP. It is unclear what justification there is for any increased setback. With respect to ephemeral watercourses, Transpower opposes references to ephemeral watercourses in the rule on the basis that they are typically not mapped and, in practice, difficult to clearly define. This introduces significant uncertainty into the scope and spatial application of the rule.	Disallow in part	Transpower opposes the request to amend earthworks rule P.R22 to increase the setback for earthworks from 5m to 10m. Transpower opposes the request to amend earthworks rule P.R22 to refer to ephemeral watercourses.	Accept
	Forest & Bird	FS27.812	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
	Forest & Bird	FS28.082	Waka Kotahi NZ Transport Agency	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Oppose	The RMA defines “river” as being continually or intermittently flowing body of freshwater The NPS-FW and NES-FW include provisions for the management of permanent and intermittent rivers and streams. These provisions do not extend to ephemeral streams.	Disallow	Not stated	Accept
S261.194	Forest & Bird (S261)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Oppose		Considers the matters of discretion are not wide enough to ensure all adverse effects on all important ecological values are addressed.	Reclassify as a discretionary activity rule.  Any further consequential or alternative relief as may be necessary and appropriate to address concerns.		Reject
	Forest & Bird	FS9.521	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Oppose	Not stated	Disallow	Not stated	Accept
	Forest & Bird	FS20.050	Transpower New Zealand Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Oppose	Subject to the decision requested by Transpower in its submission on rule P.R23 being allowed, Transpower considers that the matters of discretion recognise an appropriate range of potential adverse effects associated with earthworks. On this basis, Transpower considers that discretionary activity status is unjustified.	Disallow	Transpower opposes the request to amend the activity status of earthworks rule P.R23 from restricted discretionary to discretionary.	Accept
	Forest & Bird	FS27.813	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
	Forest & Bird	FS28.084	Waka Kotahi NZ Transport Agency	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Oppose	Effects can be appropriate managed via RDA status.	Disallow	Not stated	Accept
	Forest & Bird	FS45.039	Kāinga Ora – Homes and Communities	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Oppose	Subject to the Kāinga Ora primary submission, Kāinga Ora oppose the elevation of this rule from RDA to discretionary and do not consider that additional matters of discretion are required as this is overly onerous.	Disallow	Considers the matters of discretion are not wide enough to ensure all adverse effects on all important ecological values are addressed. Reclassify as a discretionary activity rule. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.	Accept
	Forest & Bird	FS47.427	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Oppose	Restricted discretionary activity status provides sufficient rigour to address likely environmental effects;	Disallow	Disallow S261.194.	Accept
S261.195	Forest & Bird (S261)			9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.	Support		Supports consistency with the purpose of the RMA, in conjunction with relief sought by the submitter.	Retain as notified		Reject
	Forest & Bird	FS9.522	New Zealand Farm Forestry Association (NZFFA)	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Oppose	Not stated	Disallow	Not stated	Accept
	Forest & Bird	FS27.814	Manor Park and Haywards Residents	9 Te Awarua-o-	Rule P.R24: Earthworks – non-		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
			Community Incorporate ("MPHRCI")	Porirua Whaitua	complying activity.			and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
	Forest & Bird	FS47.440	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Oppose	Meridian considers the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;	Disallow	Disallow S261.195 and provide for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.	Reject
S263.012	New Zealand Carbon Farming Group ('NZCF') (S263)			2 Interpretation	Earthworks	Support		Does not oppose inclusion of a definition of 'Earthworks' in NRP and notes the definition appropriately replicates the definition required by the National Planning Standards for most activities. With regards to the definition that applies to Rules WH.R20, WH.R21, P.R19 and P.R20, submitter notes that the proposed definition refers to NESPF 2017 and therefore the exception in the definition does not apply to earthworks for the establishment of permanent forests, including commercial forests for carbon sequestration purposes.	Retain 'Earthworks' definition as notified.		Accept in part
	New Zealand Carbon Farming Group ('NZCF')	FS23.383	Forest & Bird	2 Interpretation	Earthworks		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										points and specific relief.	
S274.001	Goodman Contractors Limited (S274)			2 Interpretation	Earthworks	Oppose		Doesn't make sense to have different definitions for earthworks between different districts in the same region.	Retain the old definition for the entire region.		Reject
	Goodman Contractors Limited	FS16.046	Woodridge Holdings Ltd	2 Interpretation	Earthworks		Not stated	The cost and time implications of the "Earthworks" definition do not appear to have been thought through or considered in the s32 analysis.	Allow	Provide one definition for earthworks for the region.  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.	Reject
	Goodman Contractors Limited	FS47.112	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The operative NRP definition, with including the listed excluded activities, should apply throughout the region. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow S274.001.	Reject
S274.002	Goodman Contractors Limited (S274)			9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Oppose		Considers changing discharge standards is onerous for contractors as suspended solids tests take time for results whereas turbidity which is a real time test. Queries who is a 'suitably qualified person' for taking tests and why the policy uses 100g/m3, as at a point in time after rainfall every site across the region could be non-compliant. Notes that working in a heavy materials could mean a high suspended solids reading but a low turbidity reading.	Amend provision to provide for the standard measure of NTU.		Accept
	Goodman Contractors Limited	FS34.050	Orogen Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.		Support	NTU measurement is more appropriate as per Orogen S239.010	Allow	Agree	Accept
S274.003	Goodman Contractors Limited (S274)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose		Concerns on economic impact of shutting down all earthworks over winter and that there has to be a balance between environment and commercial viability. Considers where sites are low risk and contractors capable of taking care of the environment then winter work should be able to occur and permits/consent able to be sought.	Amend PC1 to provide more enabling framework for winter works.		Accept in part
	Goodman Contractors Limited	FS16.178	Woodridge Holdings Ltd	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Not stated	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. 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.	Allow	Delete policy and make earthworks greater than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	Goodman Contractors Limited	FS34.051	Orogen Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Refer to Orogen submission S239.012 & S239.019. A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approach to earthworks provides a better outcome for industry and compliance.	Allow	Delete policy and amend associated rule.	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Goodman Contractors Limited	FS47.344	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S274.003 by deleting Policy P.P29.	Accept
S275.003	Waka Kotahi NZ Transport Agency (S275)			2 Interpretation	Earthworks	Amend		Considers the definition is very confined and will not allow for the construction, repair, upgrade or maintenance of infrastructure.	Provide an exclusion (as per (d) “for all other whaitua”) to enable construction, repair, upgrade or maintenance of infrastructure where standards are met.  Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.		Reject
	Waka Kotahi NZ Transport Agency	FS16.047	Woodridge Holdings Ltd	2 Interpretation	Earthworks		Not stated	The cost and time implications of the "Earthworks" definition do not appear to have been thought through or considered in the s32 analysis.	Allow	Provide one definition for earthworks for the region.  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.	Reject
	Waka Kotahi NZ Transport Agency	FS20.082	Transpower New Zealand Limited	2 Interpretation	Earthworks		Support	The decision requested is consistent with the decisions requested in Transpower's submission on the definition of “earthworks”.	Allow	Transpower supports the request to provide for the exclusions (as set out under clause (d) of the operative definition of “earthworks”) to enable construction, repair, upgrade or maintenance of infrastructure.	Reject
	Waka Kotahi NZ Transport Agency	FS23.697	Forest & Bird	2 Interpretation	Earthworks		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Waka Kotahi NZ Transport Agency	FS47.113	Meridian Energy Limited	2 Interpretation	Earthworks		Support in part	Retention of all of the operative exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow in part	Allow S275.003 by reinstating the list of exclusions (a) to (i) from the operative NRP.	Reject
S275.031	Waka Kotahi NZ Transport Agency (S275)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		Notes the notified version of this rule contained errors which have now been corrected. Considers the rule also needs to be amended to provide for the ability of some sediment and/or flocculant the stormwater network. Considers a limit of no discharge is unworkable without completely isolating the site from the network and treating all sediment / flocculant discharge to 100% is not feasible.	Amend the rules to provide for some sediment and/or flocculant discharge where appropriate sediment control methods are in place. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Waka Kotahi NZ Transport Agency	FS23.725	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Waka Kotahi NZ Transport Agency	FS36.004	Wellington City Council	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Consistent with Wellington City Council's position on the matter.	Allow	Not stated	Accept
	Waka Kotahi NZ Transport Agency	FS47.260	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support in part	Meridian agrees that clause (g) is unachievable and unreasonable;	Allow in part	Allow S275.031 by deleting clause (g).	Reject
S275.032	Waka Kotahi NZ Transport Agency (S275)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		Notes the notified version of this rule contained errors which have now been corrected. Considers the rule also needs to be amended to provide for the ability of some sediment and/or flocculant the stormwater network. Considers a limit of no discharge is unworkable without completely isolating the site from the network and treating all sediment / flocculant discharge to 100% is not feasible.	Amend the rule to provide for some sediment and/or flocculant discharge where appropriate sediment control methods are in place. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.		Reject
	Waka Kotahi NZ Transport Agency	FS23.726	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Waka Kotahi NZ Transport Agency	FS47.289	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support in part	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow in part	Allow S275.032 by deleting clause (b) and related discretionary matter (8).	Reject
S275.033	Waka Kotahi NZ Transport Agency (S275)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.	Amend		Notes the notified version of this rule contained errors which have now been corrected. Considers the rule also needs to be amended to provide for the ability of some sediment and/or flocculant the stormwater network. Considers a limit of no discharge is unworkable without completely isolating the site from the network and treating all sediment / flocculant discharge to 100% is not feasible.	Amend the rule to provide for some sediment and/or flocculant discharge where appropriate sediment control methods are in place. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.		Reject
	Waka Kotahi NZ Transport Agency	FS23.727	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S275.034	Waka Kotahi NZ Transport Agency (S275)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Amend		Notes the notified version of this rule contained errors which have now been corrected. Considers the rule also needs to be amended to provide for the ability of some sediment and/or flocculant the stormwater network. Considers a limit of no discharge is unworkable without completely isolating the site from	Amend the rule to provide for some sediment and/or flocculant discharge where appropriate sediment control methods are in place. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.		Accept



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								the network and treating all sediment / flocculant discharge to 100% is not feasible.			
	Waka Kotahi NZ Transport Agency	FS23.728	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Waka Kotahi NZ Transport Agency	FS36.005	Wellington City Council	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Consistent with Wellington City Council's position on the matter.	Allow	Not stated	Accept
	Waka Kotahi NZ Transport Agency	FS47.400	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support in part	Meridian agrees that clause (g) is unachievable and unreasonable;	Allow in part	Allow S275.034 by deleting clause (g).	Accept
S275.035	Waka Kotahi NZ Transport Agency (S275)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Amend		Notes the notified version of this rule contained errors which have now been corrected. Considers the rule also needs to be amended to provide for the ability of some sediment and/or flocculant the stormwater network. Considers a limit of no discharge is unworkable without completely isolating the site from the network and treating all sediment / flocculant discharge to 100% is not feasible.	Amend the rule to provide for some sediment and/or flocculant discharge where appropriate sediment control methods are in place. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.		Accept in part
	Waka Kotahi NZ Transport Agency	FS16.179	Woodridge Holdings Ltd	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Not stated	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.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.	Allow	Delete policy and make earthworks greater than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	Waka Kotahi NZ Transport Agency	FS23.729	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S275.036	Waka Kotahi NZ Transport Agency (S275)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose		Considers prohibiting earthworks between the 1st of June and the 30th of September would impose significant constraints on the construction programme for NZTA's essential works to provide for a safe transport network. Suggests instead of blanket rules and non-complying activity status for winter works, a permitted level to provide for maintenance and minor upgrade activity (subject to appropriate controls as a performance standard) combined with a restricted discretionary status for larger scale works can address any potential issues with winter works.	Remove the control on winter works or, at a minimum, provide for a process for 'winter works' approval without the need for a further resource consent. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.		Accept
	Waka Kotahi NZ Transport Agency	FS16.180	Woodridge Holdings Ltd	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Not stated	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.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.	Allow	Delete policy and make earthworks greater than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Waka Kotahi NZ Transport Agency	FS23.730	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Waka Kotahi NZ Transport Agency	FS47.345	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S275.036 by deleting Policy P.P29	Accept
S275.037	Waka Kotahi NZ Transport Agency (S275)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose		Considers prohibiting earthworks between the 1st of June and the 30th of September would impose significant constraints on the construction programme for NZTA's essential works to provide for a safe transport network. Suggests instead of blanket rules and non-complying activity status for winter works, a permitted level to provide for maintenance and minor upgrade activity (subject to appropriate controls as a performance standard) combined with a restricted discretionary status for larger scale works can address any potential issues with winter works.	Remove the control on winter works or, at a minimum, provide for a process for 'winter works' approval without the need for a further resource consent. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.		Accept in part
	Waka Kotahi NZ Transport Agency	FS23.731	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Waka Kotahi NZ Transport Agency	FS47.198	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S275.037 by deleting Policy WH.P31.	Accept
S275.038	Waka Kotahi NZ Transport Agency (S275)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Amend		Notes these provisions contain specific numeric standards for discharge of sediment which does not allow for a site by site assessment to determine if the standard set is appropriate for the receiving environment. Concerned that determining activity status will be based on a predicted level of performance and it is unclear if a further consent (under Rule P.R24) would be required if P.R.23(a) was not met. Considers the 100g/m3 and associated 20% and 30% visual clarity requirements would be better placed as matters of discretion/assessment and set in a policy framework which indicates this is a desired outcome, to allow for different parameters to be set based on the detail of the receiving environment.	Modify rules to provide for 100g/m3 and associated 20% and 30% visual clarity as matters of discretion/assessment. Adjust policy framework to set 100g/m3 and associated 20% and 30% visual clarity as outcomes to be achieved unless an alternative, receiving environment specific, outcome is agreed. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.		Reject
	Waka Kotahi NZ Transport Agency	FS23.732	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S275.039	Waka Kotahi NZ Transport Agency (S275)			9 Te Awarua-o-	Policy P.P28: Discharge	Amend		Notes these provisions contain specific numeric standards for discharge of sediment which does not allow for a site by site assessment to determine if the	Modify rules to provide for 100g/m3 and associated 20% and 30% visual clarity as matters of discretion/assessment.		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				Porirua Whaitua	standard for earthworks sites.			standard set is appropriate for the receiving environment. Concerned that determining activity status will be based on a predicted level of performance and it is unclear if a further consent (under Rule P.R24) would be required if P.R.23(a) was not met. Considers the 100g/m3 and associated 20% and 30% visual clarity requirements would be better placed as matters of discretion/assessment and set in a policy framework which indicates this is a desired outcome, to allow for different parameters to be set based on the detail of the receiving environment.	Adjust policy framework to set 100g/m3 and associated 20% and 30% visual clarity as outcomes to be achieved unless an alternative, receiving environment specific, outcome is agreed. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.		
	Waka Kotahi NZ Transport Agency	FS23.733	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S275.040	Waka Kotahi NZ Transport Agency (S275)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Amend		Supports the intent behind the reduction in contaminant loads proposed but is unclear if and how the reduction can be sustained. Suggests further information should be provided before targets are adopted. Considers the Section 32 assessment focuses on local authority costs, not NZTA costs and the value of investment/forward planning which has already been made through the consent process under the Operative Plan is also not explicitly recognised.	Further consideration of the feasibility and costs of this these targets Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.		Reject
	Waka Kotahi NZ Transport Agency	FS16.181	Woodridge Holdings Ltd	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Not stated	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. 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.	Allow	Delete policy and make earthworks greater than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	Waka Kotahi NZ Transport Agency	FS23.734	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S279.010	KiwiRail Holdings Limited (KiwiRail) (S279)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Support		Supports the intent of the provision.	Retain as notified		Accept in part
	KiwiRail Holdings Limited (KiwiRail)	FS27.1074	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S279.011	KiwiRail Holdings Limited (KiwiRail) (S279)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Support		Supports the intent of the provision.	Retain as notified		Accept in part
	KiwiRail Holdings Limited (KiwiRail)	FS27.1075	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S279.012	KiwiRail Holdings Limited (KiwiRail) (S279)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.	Support		Supports the intent of the provision.	Retain as notified		Reject
	KiwiRail Holdings Limited (KiwiRail)	FS27.1076	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part
S279.023	KiwiRail Holdings Limited (KiwiRail) (S279)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Support		Supports the intent of the provision.	Retain as notified		Reject
	KiwiRail Holdings Limited (KiwiRail)	FS27.1087	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
S279.024	KiwiRail Holdings Limited (KiwiRail) (S279)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Support		Supports the intent of the provision.	Retain as notified		Reject
	KiwiRail Holdings Limited (KiwiRail)	FS27.1088	Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that “planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered	Allow	Not stated	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.			
	KiwiRail Holdings Limited (KiwiRail)	FS47.428	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Oppose in part	Meridian considers the clause (b) restriction on winter earthworks is unreasonable and unnecessary;	Disallow in part	Disallow S279.024 in part by deleting clause (b) and related discretionary matter (8).	Reject
S279.025	KiwiRail Holdings Limited (KiwiRail) (S279)			9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.	Support		Supports the intent of the provision.	Retain as notified		Reject
	KiwiRail Holdings Limited (KiwiRail)	FS27.1089	Manor Park and Haywards Residents Community Incorporate ("MPHRCI")	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Support	Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome. 30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban. MPHRCI does not agree with Waste Management New Zealand Limited that "planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the 'planned / existing urban area'". This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses. MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as 'planned urban'. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.	Allow	Not stated	Accept in part
	KiwiRail Holdings Limited (KiwiRail)	FS47.441	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Oppose	Meridian considers the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;	Disallow	Disallow S279.025 and provide for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S281.005	Kirsty Gill (S281)			General comments	General comments - earthworks	Oppose		Considers earthwork provisions are complicated and farmers/land owners will not know how to meet requirements. Concerned stock welfare, farm safety and farm tracks access have been disregarded in new provisions.	Not Stated.		Reject
S285.002	Civil Contractors New Zealand (S285)			General comments	General comments - earthworks	Not Stated		Notes that in relation to new regulations around vegetation clearance (for instance Rule WH.R18), engagement should be undertaken with the industry so contractors can adequately understand their responsibilities around sediment control while working on vegetation clearance sites. Advises it is unwise to include an impassable threshold in any standard, because at a point in time, rainfall events or unanticipated weather will throw this measure out. For instance, at certain points in time (for instance flooding) no site would comply even if there was no discharge from the site itself, so no work would be able to meet this term in consent. Considers it is better to include specific numbers in the guidance on how the standards set by the Natural Resources Plan are implanted on work sites, rather than in the Natural Resources Plan itself.	Not stated		Reject
	Civil Contractors New Zealand	FS35.002	Goodman Contractors Limited	General comments	General comments - earthworks		Support	I also support the rest of the points made in the Civil Contractors New Zealand submission, and ask you to consider the impacts this plan change will have on horizontal construction across the region, which will increase costs across the board, including housing, transport and water construction. Overall, I feel direct consultation with the civil construction industry has been absent in the creation of this plan, and is required to make sure the Natural Resources Plan is fit for purpose. I also feel that the consultation process is very difficult to follow, ruling most contractors out of having a say. Accordingly, I request the plan change does not go ahead.	Allow	Plan change 1 does not go ahead	Reject
	Civil Contractors New Zealand	FS49.002	Multi Civil Contractors Ltd	General comments	General comments - earthworks		Support	Do not proceed with your proposal to implement different definitions of earthworks in different part of the region. This will only result in added cost and confusion. Please retain the existing definition of earthworks. Delete policy P.R24 (which treats earthworks as a non-complying activity and should instead treat it as a restricted discretionary activity).	Allow	Do not proceed with your proposal to implement different definitions of earthworks in different part of the region. This will only result in added cost and confusion. Please retain the existing definition of earthworks. Delete policy P.R24 (which treats earthworks as a non-complying activity and should instead treat it as a restricted discretionary activity).	Reject
S285.003	Civil Contractors New Zealand (S285)			General comments	General comments - earthworks	Not Stated		Notes the region is currently experiencing a major shortage of available cleanfill disposal sites, with a single significant site left in Wellington near the Southern Landfill, and this is escalating project costs. Appreciates sediment control is an important factor when planning land use for cleanfill sites.	GWRC provide clarity about appropriate locations and conditions for cleanfill sites		Reject
	Civil Contractors New Zealand	FS8.004	Winstone Aggregates	General comments	General comments - earthworks		Support in part	Winstone agree with the general submission point. There is a lack of appropriate locations for both cleanfill and quarry sites throughout the Wellington Region. With increasing demand for aggregate resource, there must be appropriate provision for those activities in the Natural Resources Plan. Further detail on this point has been provided in Winstone's original submission.	Allow in part	Winstone seeks to allow relief that Greater Wellington Regional Council provide further direction on appropriate locations and conditions for cleanfill sites. In	Reject



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										addition, Winstone seek that this direction also be provided for quarrying activities.	
	Civil Contractors New Zealand	FS15.001	Construction Contracts Ltd	General comments	General comments - earthworks		Support	The region is currently experiencing a major shortage of available cleanfill disposal sites, with a single significant site left in Wellington near the Southern Landfill, and this is escalating project costs. If this single remaining site fills up, shipping cleanfill out of the region will greatly escalate cost and reduce project efficiency.	Allow	GWRC to take more responsibility for planning and consenting appropriate cleanfill site locations across the region, especially if this material must be disposed of at an official cleanfill site. The wording 'to a cleanfill site' should be removed in the short term, as there are very few available sites.	Reject
	Civil Contractors New Zealand	FS35.003	Goodman Contractors Limited	General comments	General comments - earthworks		Support	The region is currently experiencing a major shortage of available cleanfill disposal sites, with a single significant site left in Wellington near the Southern Landfill, and this is escalating project costs. If this single remaining site fills up, shipping cleanfill out of the region will greatly escalate cost and reduce project efficiency.	Allow	GWRC to take more responsibility for planning and consenting appropriate cleanfill site locations across the region, especially if this material must be disposed of at an official cleanfill site. The wording 'to a cleanfill site' should be removed in the short term, as there are very few available sites.	Reject
	Civil Contractors New Zealand	FS32.002	PCL Contracting Ltd as part of CCNZ	General comments	General comments - earthworks		Support	Not stated	Allow	Notes the region is currently experiencing a major shortage of available cleanfill disposal sites, with a single significant site left in Wellington near the Southern Landfill, and this is escalating project costs. Appreciates sediment control is an important factor when planning land use for cleanfill sites.	Reject
	Civil Contractors New Zealand	FS34.013	Orogen Limited	General comments	General comments - earthworks		Support	Cleanfill supports all aspects of the civil and building industry. Current rules and policies regarding Cleanfill have resulted in projects carting surplus material as far as Fielding from Wellington. The impact on our carbon footprint and transport network from this behavior is not desired by anyone.	Allow	Regional enablement and planning is required to provide for Cleanfill, quarry, and landfill in the region.	Reject
	Civil Contractors New Zealand	FS49.003	Multi Civil Contractors Ltd	General comments	General comments - earthworks		Support	Consider in P.R31, P.R32, P.R33 water usage for emergency works and essential environmental controls - i.e., dust control.	Allow	Consider in P.R31, P.R32, P.R33 water usage for emergency works and essential environmental controls - i.e., dust control.	Reject
	Civil Contractors New Zealand	FS10.7	Enviro NZ Services Ltd (Enviro NZ)	General comments	General comments - earthworks		Support	Cleanfill sites are part of waste infrastructure and must be enabled with appropriate consenting pathways.	Allow	Clarity is required for consenting of potential cleanfill sites	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S285.006	Civil Contractors New Zealand (S285)			2 Interpretation	Earthworks	Amend		Considers the definition needs refinement as it will require considerable resource from industry to understand and implement, may escalate project costs, and result in worse outcomes and impact the ability for transport and water infrastructure networks to be repaired or maintained efficiently. Considers the new definition for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua is not needed, as it applies the term too broadly. Considers the addition of 'to a cleanfill area' to 2.2 (i) is problematic as there are constraints around sites in the region at the moment and the availability of cleanfill sites needs to be taken into account as this could hamper the ability to deliver infrastructure projects. Notes the definition may result in consent applications being required for minor pipe or road repairs.	Reinstate NRP definition of earthworks. Remove 'to a cleanfill area' from the point in definition for 'all other whaitua'.		Reject
	Civil Contractors New Zealand	FS15.002	Construction Contracts Ltd	2 Interpretation	Earthworks		Support	Changing the definition of earthworks will require considerable resource from industry to understand and implement. The existing definition of earthworks is well understood, and the complication arising from a new definition for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua is not needed. The addition of 'to a cleanfill area' to 2.2(i) is problematic as there are significant constraints around sites in the region at the moment and the availability of cleanfill sites needs to be taken into account. If it is not, this will hamper the ability to deliver infrastructure projects. The new definition proposed may also result in a significant rise in consent applications being required for minor pipe or road repairs, which is something that should be avoided as it will not add value and council is unlikely to be resourced to handle the required volume of consent applications in a timely way.	Allow	Reinstate the previous definition of earthworks. Remove 'to a cleanfill area' from the point in definition for 'all other whaitua'.	Reject
	Civil Contractors New Zealand	FS35.006	Goodman Contractors Limited	2 Interpretation	Earthworks		Support	Changing the definition of earthworks will require considerable resource from industry to understand and implement. The existing definition of earthworks is well understood, and the complication arising from a new definition for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua is not needed. The addition of 'to a cleanfill area' to 2.2(i) is problematic as there are significant constraints around sites in the region at the moment and the availability of cleanfill sites needs to be taken into account. If it is not, this will hamper the ability to deliver infrastructure projects. The new definition proposed may also result in a significant rise in consent applications being required for minor pipe or road repairs, which is something that should be avoided as it will not add value and council is unlikely to be resourced to handle the required volume of consent applications in a timely way.	Allow	Reinstate the previous definition of earthworks. Remove 'to a cleanfill area' from the point in definition for 'all other whaitua'.	Reject
	Civil Contractors New Zealand	FS32.003	PCL Contracting Ltd as part of CCNZ	2 Interpretation	Earthworks		Support	Not stated	Allow	Considers the definition needs refinement as it will require considerable resource from industry to understand and implement, may escalate project costs, and result in worse outcomes and impact the ability for transport and water infrastructure networks to be repaired or maintained efficiently. Considers the new	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										definition for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua is not needed, as it applies the term too broadly. Considers the addition of 'to a cleanfill area' to 2.2 (i) is problematic as there are constraints around sites in the region at the moment and the availability of cleanfill sites needs to be taken into account as this could hamper the ability to deliver infrastructure projects. Notes the definition may result in consent applications being required for minor pipe or road repairs.	
	Civil Contractors New Zealand	FS34.014	Orogen Limited	2 Interpretation	Earthworks		Support	See Orogen submission point S239.003. The point here from CCNZ reinforces our points that PC1 introduces ambiguity and real cost implications to industry and our society.	Allow in part	Review definition of 'earthworks'.	Reject
	Civil Contractors New Zealand	FS47.114	Meridian Energy Limited	2 Interpretation	Earthworks		Support in part	Reinstatement of the exclusions in the operative NRP definition is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008. Meridian takes no position on amendment relating to cleanfills;	Allow in part	Allow S285.006 by reinstating the list of exclusions (a) to (i) from the operative NRP.	Reject
	Civil Contractors New Zealand	FS49.006	Multi Civil Contractors Ltd	2 Interpretation	Earthworks		Support	Not stated	Allow	Request that plan change does not go ahead	Reject
	Civil Contractors New Zealand	FS10.20	Enviro NZ Services Ltd (Enviro NZ)	2 Interpretation	Earthworks		Support	As per submission point	Allow	All	Reject
S285.017	Civil Contractors New Zealand (S285)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Support		Not stated	Not stated		Accept
	Civil Contractors New Zealand	FS35.017	Goodman Contractors Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Support	I also support the rest of the points made in the Civil Contractors New Zealand submission, and ask you to consider the impacts this plan change will have on horizontal construction across the region, which will increase costs across the board, including housing, transport and water construction. Overall, I feel direct consultation with the civil construction industry has been absent in the creation of this plan, and is required to make sure the Natural Resources Plan is fit for purpose. I also feel that the consultation process is very difficult to follow, ruling most contractors out of having a say. Accordingly, I request the plan change does not go ahead.	Allow	Plan change 1 does not go ahead	Reject
	Civil Contractors New Zealand	FS49.017	Multi Civil Contractors Ltd	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Support	Not stated	Allow	Request that plan change does not go ahead	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S285.018	Civil Contractors New Zealand (S285)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Oppose		Notes test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.	Amend to either specify which sort of test is used and leave this to implementation guidance, or refer to the correct on-site test method (NTU).		Accept
	Civil Contractors New Zealand	FS15.003	Construction Contracts Ltd	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Support	Test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked (consider pumice vs iron sand) and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.	Allow	Delete specific reference to test methodologies from the plan and handle site testing based on the nature of the site and its location. Or, (minimum) make sure the test method used is industry appropriate, and not increasing cost without adding value.	Accept in part
	Civil Contractors New Zealand	FS35.018	Goodman Contractors Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Support	Test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked (consider pumice vs iron sand) and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.	Allow	Delete specific reference to test methodologies from the plan and handle site testing based on the nature of the site and its location. Or, (minimum) make sure the test method used is industry appropriate, and not increasing cost without adding value.	Accept in part
	Civil Contractors New Zealand	FS32.008	PCL Contracting Ltd as part of CCNZ	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Support	Not stated	Allow	Notes test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable	
	Civil Contractors New Zealand	FS45.005	Kāinga Ora – Homes and Communities	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Support	Kāinga Ora supports testing for turbidity as a measure for earthworks consents and the allowance for on-site test method (NTU) to ensure efficient testing which does not require laboratory results that can take 1-2 weeks to receive results.	Allow	Amend to either specify which sort of test is used and leave this to implementation guidance or refer to the correct onsite test method (NTU).	Accept
	Civil Contractors New Zealand	FS49.018	Multi Civil Contractors Ltd	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Support	Delete policy WH. P30: Discharge standard for earthworks. The proposed test methodology is not fit for purpose, and this should instead be handled in consent conditions depending on the nature of the site where the earthworks are taking place. If the policy is to remain, the test methodology should be handled in guidance depending on the site and its surroundings, not as a blanket rule in the Natural Resources Plan itself.	Allow	Delete policy WH. P30: Discharge standard for earthworks. The proposed test methodology is not fit for purpose, and this should instead be handled in consent conditions depending on the nature of the site where the earthworks are taking place. If the policy is to remain, the test methodology should be handled in guidance depending on the site and its surroundings, not as a blanket rule in the Natural Resources Plan itself.	Reject
S285.019	Civil Contractors New Zealand (S285)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose		Seeks clarification on whether this clause stops all jobs in winter. Considers a 'hard shutdown' over winter will render civil construction and earthmoving companies unable to retain staff and increase project costs significantly. Considers the plan change does not take into account differences in material worked or terrain and that some winter works must be allowed via resource consents or some other avenue, if the site meets certain criteria. Notes some jobs (sand jobs) have much less sediment and runoff in rainfall and winter is actually a better time for these jobs to run, as there is less dust.	Delete policy WH.P31 If amended, ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'		Accept
	Civil Contractors New Zealand	FS8.005	Winstone Aggregates	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Winstone agree with the intent of the relief sought by the submitter which is the earthworks provisions must appropriately enable necessary activities to continue over the winter months. While Winstone support 'regionally significant infrastructure' being a qualifier for this, if the relief is accepted, Winstone seek that it also provides for other necessary activities including 'quarrying activities.	Allow in part	Winstone seek to allow the relief sought that Policy WH.P29 is either deleted or amended to ensure appropriate exemptions are provided. Should policy be amended, Winstone seek that quarrying activities are specifically identified in the exemptions.	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Civil Contractors New Zealand	FS15.004	Construction Contracts Ltd	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	This policy will be catastrophic for the region, and greatly reduce contractor capacity. A 'hard shutdown' overwinter will render civil construction and earthmoving companies unable to retain staff (impossible to hold a job where you cannot work for four months of the year). In turn, this will increase project costs significantly. The plan change also does not take into account differences in material worked or terrain and that some winter works must be allowed via resource consents or some other avenue, if the site meets certain criteria. Notes some jobs (sand jobs) have much less sediment and runoff in rainfall and winter is actually a better time for these jobs to run, as there is less dust.	Allow	Delete policy WH.P31 If amended rather than deleted, ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. Increasing hard shutdown of work sites over winter is not tenable for the region's civil construction industry.	Accept
	Civil Contractors New Zealand	FS35.019	Goodman Contractors Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	This policy will be catastrophic for the region, and greatly reduce contractor capacity. A 'hard shutdown' overwinter will render civil construction and earthmoving companies unable to retain staff (impossible to hold a job where you cannot work for four months of the year). In turn, this will increase project costs significantly. The plan change also does not take into account differences in material worked or terrain and that some winter works must be allowed via resource consents or some other avenue, if the site meets certain criteria. Notes some jobs (sand jobs) have much less sediment and runoff in rainfall and winter is actually a better time for these jobs to run, as there is less dust.	Allow	Delete policy WH.P31 If amended rather than deleted, ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. Increasing hard shutdown of work sites over winter is not tenable for the region's civil construction industry.	Accept
	Civil Contractors New Zealand	FS32.009	PCL Contracting Ltd as part of CCNZ	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	The potential economic impact to many companies will be significant, causing not only loss of businesses, reduced projects and housing, further delays in the consenting process with considerable impact on social outcomes. With reduced work, companies will be forced to restructure, causing an increase in unemployment. As with any proposed changes the proposal must take a holistic approach to considering all areas of impact. Providing companies with a 4 month shutdown is not economically viable and will force business out of the wellington region.	Allow	Seeks clarification on whether this clause stops all jobs in winter. Considers a 'hard shutdown' over winter will render civil construction and earthmoving companies unable to retain staff and increase project costs significantly. Considers the plan change does not take into account differences in material worked or terrain and that some winter works must be allowed via resource consents or some other avenue, if the site meets certain criteria. Notes some jobs (sand jobs) have much less sediment and runoff in rainfall and winter is actually a better time for these jobs to run, as there is less dust	Reject
	Civil Contractors New Zealand	FS45.007	Kāinga Ora – Homes and Communities	8 Whaitua Te	Policy WH.P31: Winter shut		Support	Kāinga Ora supports the deletion of this policy, or if amended, amendment to adequately provide for	Allow	Delete policy WH.P31 If amended, ensure	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				Whanganui-a-Tara	down of earthworks.			winter earthworks where potential sediment can be well managed.		sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'.	
	Civil Contractors New Zealand	FS49.019	Multi Civil Contractors Ltd	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Delete policy WH. P31 and P.P29, which dictate hard shutdowns of earthworks sites for four months of the year. This policy will be disastrous for the regional industry, as it will prevent companies from retain earthmoving staff over those months. In turn, this will greatly escalate project cost and the ability for projects to proceed across the region. And if it is applied to sites that are already well-managed, it will create cost and disruption while adding no value. This approach must be reconsidered.	Allow	Delete policy WH. P31 and P.P29, which dictate hard shutdowns of earthworks sites for four months of the year. This policy will be disastrous for the regional industry, as it will prevent companies from retain earthmoving staff over those months. In turn, this will greatly escalate project cost and the ability for projects to proceed across the region. And if it is applied to sites that are already well-managed, it will create cost and disruption while adding no value. This approach must be reconsidered.	Accept
S285.024	Civil Contractors New Zealand (S285)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		Notes that many earthworks activities undertaken by contractors working for local authority transport teams and Waka Kotahi have significant public benefits would be unable to met the permitted activity conditions of proposed Rule WH.R23, inclusive of minor repairs and maintenance of three waters infrastructure. Notes that a burst pipe may require resource consent as a restricted discretionary activity under Rule WH.R24 and this could lead to hundreds of resource consent applications per annum for minor earthworks activities. Concerns about capacity to perform this work.	Amend Rule WH.R23 to reinstate the exemptions for certain earthworks activities as exist for 'other Whaitua', including for the thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines. Any consequential amendments, to other relevant provisions, which are in general accordance with this request.		Reject
	Civil Contractors New Zealand	FS15.006	Construction Contracts Ltd	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support in part	It is important rules of this nature are as simple and easy to apply as possible. Many earthworks activities undertaken by contractors working for local authority transport teams and Waka Kotahi have significant public benefits would be unable to met the permitted activity conditions of proposed Rule WH.R23, inclusive of minor repairs and maintenance of three waters infrastructure. Notes that a burst pipe may require resource consent as a restricted discretionary activity under Rule WH.R24 and this could lead to hundreds of resource consent applications per annum for minor earthworks activities. We are concerned council would not have capacity to perform this work on a timely basis.	Allow	Amend Rule WH.R23 to reinstate the exemptions for certain earthworks activities as exist for 'other Whaitua', including for the thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines. Any consequential	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										amendments, to other relevant provisions, which are in general accordance with this request.	
	Civil Contractors New Zealand	FS35.025	Goodman Contractors Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support in part	It is important rules of this nature are as simple and easy to apply as possible. Many earthworks activities undertaken by contractors working for local authority transport teams and Waka Kotahi have significant public benefits would be unable to meet the permitted activity conditions of proposed Rule WH.R23, inclusive of minor repairs and maintenance of three waters infrastructure. Notes that a burst pipe may require resource consent as a restricted discretionary activity under Rule WH.R24 and this could lead to hundreds of resource consent applications per annum for minor earthworks activities. We are concerned council would not have capacity to perform this work on a timely basis.	Allow	Amend Rule WH.R23 to reinstate the exemptions for certain earthworks activities as exist for 'other Whaitua', including for the thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines. Any consequential amendments, to other relevant provisions, which are in general accordance with this request.	Reject
	Civil Contractors New Zealand	FS28.010	Waka Kotahi NZ Transport Agency	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Change will provide for infrastructure.	Allow	Not stated	Reject
	Civil Contractors New Zealand	FS32.011	PCL Contracting Ltd as part of CCNZ	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Potential impact on government and local government works will be impacted due to shut down periods and consent requirements	Allow	Notes that many earthworks' activities undertaken by contractors working for local authority transport teams and Waka Kotahi have significant public benefits would be unable to meet the permitted activity conditions of proposed Rule WH.R23, inclusive of minor repairs and maintenance of three waters infrastructure. Notes that a burst pipe may require resource consent as a restricted discretionary activity under Rule WH.R24 and this could lead to hundreds of resource consent applications per annum for minor earthworks activities. Concerns about capacity to perform this work.	Reject
	Civil Contractors New Zealand	FS34.019	Orogen Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	See Orogen submission point S239.003	Allow	Review definition of 'earthworks' as it applies to these rules.	Reject



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Civil Contractors New Zealand	FS49.024	Multi Civil Contractors Ltd	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Delete policy WH. R23, which is written in a way that may require resource consent for basic works and emergency maintenance of transport and water networks, and in turn may overload council consenting capacity. If you do not delete this, please remove the reference to a hard shutdown of earthworks over winter and allow appropriate exceptions to this.	Allow	Delete policy WH. R23, which is written in a way that may require resource consent for basic works and emergency maintenance of transport and water networks, and in turn may overload council consenting capacity. If you do not delete this, please remove the reference to a hard shutdown of earthworks over winter and allow appropriate exceptions to this.	Reject
S285.025	Civil Contractors New Zealand (S285)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		Strongly opposes and considers the shutdown of earthworks between 1 June and 30 September is inappropriate as works may be able to be managed during this period with no adverse effects. Notes test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.	Amend policy WH.R24 (b) If amended, ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'. Amend to either specify which sort of test is used and leave this to implementation guidance, or refer to the correct on-site test method (NTU).		Accept in part
	Civil Contractors New Zealand	FS15.007	Construction Contracts Ltd	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	The shutdown of earthworks between 1 June and 30 September is inappropriate as works can be managed during this period with no adverse effects. Test methodologies should add value rather than just adding complexity and cost, and be appropriate to how monitoring occurs on site. The industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids (inappropriate as different materials have a different weight - i.e. iron sand vs pumice).	Allow	Amend policy WH.R24 (b) If amended, ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'. Amend to either specify which sort of test is used and leave this to implementation guidance, or refer to the correct on-site test method (NTU).	Accept in part
	Civil Contractors New Zealand	FS35.026	Goodman Contractors Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	The shutdown of earthworks between 1 June and 30 September is inappropriate as works can be managed during this period with no adverse effects. Test methodologies should add value rather than just adding complexity and cost, and be appropriate to how monitoring occurs on site. The industry uses turbidity as a measure for earthworks consents,	Allow	Amend policy WH.R24 (b) If amended, ensure sufficient and appropriate exemptions exist to provide some ability for winter	Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								whereas PC1 specifies a measure of total suspended solids (inappropriate as different materials have a different weight - i.e. iron sand vs pumice).		earthworks in situations where potential sediment can be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'. Amend to either specify which sort of test is used and leave this to implementation guidance, or refer to the correct on-site test method (NTU).	
	Civil Contractors New Zealand	FS32.012	PCL Contracting Ltd as part of CCNZ	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Strongly agree opposing the winter shutdown period of winter works	Allow	Strongly opposes and considers the shutdown of earthworks between 1 June and 30 September is inappropriate as works may be able to be managed during this period with no adverse effects. Notes test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays	Accept in part
	Civil Contractors New Zealand	FS34.015	Orogen Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted		Support	Refer to Orogen submission S239.004, S239.011, S239.012 & S239.019. A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approach to earthworks	Allow	Delete policy and amend associated rules.	reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					discretionary activity.			provides a better outcome for industry and compliance.			
	Civil Contractors New Zealand	FS47.290	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support in part	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and agrees there should, at the least, be provision for winter earthworks for regionally significant infrastructure (subject to appropriate conditions). Meridian's preference is that clause (b) and related discretionary matter (8) are deleted;	Allow in part	Allow S285.025 by deleting clause (b) and related discretionary matter (8).	reject
	Civil Contractors New Zealand	FS49.025	Multi Civil Contractors Ltd	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Not stated	Allow	Request that plan change does not go ahead	reject
S285.030	Civil Contractors New Zealand (S285)			9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Not Stated		Strongly opposes and considers the shutdown of earthworks between 1 June and 30 September is inappropriate as works may be able to be managed during this period with no adverse effects. Notes test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.	Amend to either specify which sort of test is used and leave this to implementation guidance, or refer to the correct on-site test method (NTU).		Accept
	Civil Contractors New Zealand	FS15.009	Construction Contracts Ltd	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.		Support	Strongly opposes and considers the shutdown of earthworks between 1 June and 30 September is inappropriate as works may be able to be managed during this period with no adverse effects. Notes test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.	Allow	Strongly amend to remove prevention of winter work permits, amend to either specify which sort of test is used and leave this to implementation guidance, or refer to the correct on-site test method (NTU).	Accept
	Civil Contractors New Zealand	FS35.031	Goodman Contractors Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.		Support	Strongly opposes and considers the shutdown of earthworks between 1 June and 30 September is inappropriate as works may be able to be managed during this period with no adverse effects. Notes test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of	Allow	Strongly amend to remove prevention of winter work permits, amend to either specify which sort of test is used and leave this to implementation guidance, or refer to the correct on-site test method (NTU).	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.			
	Civil Contractors New Zealand	FS32.017	PCL Contracting Ltd as part of CCNZ	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.		Support	This does not take into account local conditions like Kapiti where working in sand is better to be done in winter where moisture in the sand helps with compaction and dust control. Areas in winter months 1 June to 31 September quite often have less rainfall than in the spring months from 1 October to 31st December where traditionally the Wellington region suffers from large storm events and risk of runoff from sediment is far worse. We recommend that winter work still be available and all parties work collaboratively (as we currently do) to mitigate the risk through the same controls that are in place currently and during the other 8 months of the year. Limiting areas permitted doesn't consider low risk areas like flat farmland where sediment pods and runoff is minimal and where stabilisation plans can be used to mitigate run-off effectively before any rainfall events. The one rule fits all scenario will reduce productivity by effectively 33% for businesses that require year-round work in earthworks and with trenching being brought into the earthworks umbrella, it now means that a lot of Civil companies may have to shut down for that period and become seasonal occupations. This then means workers and businesses will not be able to afford to operate in this country and infrastructure rebuilding works will slow to a point that the region as a whole will be crippled. This also prevents activities like clean fills opening and operating and they form a vital part of the region's ability to do any infrastructure work. By making it harder to pen and operate a clean fill, the companies have to look elsewhere to cart material which increases costs to all projects, emissions increase as trucks are having to travel further and more trucks are then required on the road creating more wear and tear on our infrastructure meaning the roads will have a shorter life.	Allow	Strongly opposes and considers the shutdown of earthworks between 1 June and 30 September is inappropriate as works may be able to be managed during this period with no adverse effects. Notes test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.	Accept in part
	Civil Contractors New Zealand	FS34.018	Orogen Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.		Support	Refer to Orogen submission S239.004, S239.011, S239.012 & S239.019. A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approach to earthworks provides a better outcome for industry and compliance.	Allow	Delete policy and amend associated rules.	Reject
	Civil Contractors New Zealand	FS45.006	Kāinga Ora – Homes and Communities	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.		Support	Kāinga Ora supports testing for turbidity as a measure for earthworks consents and the allowance for on-site test method (NTU) to ensure efficient testing which does not require laboratory results that can take 1-2 weeks to receive results.	Allow	Amend to either specify which sort of test is used and leave this to implementation guidance or refer to the correct onsite test method (NTU).	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Civil Contractors New Zealand	FS49.030	Multi Civil Contractors Ltd	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.		Support	Not stated	Allow	Request that plan change does not go ahead	Reject
S285.031	Civil Contractors New Zealand (S285)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Amend		Considers a hard shutdown of earthworks between 1 June and 30 September is inappropriate as many works may be able to be managed during this period with no adverse effects.	Amend policy P.P29 (a) If amended, ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'.		Reject
	Civil Contractors New Zealand	FS15.010	Construction Contracts Ltd	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	A hard shutdown of earthworks between 1 June and 30 September is inappropriate as many works may be able to be managed during this period with no adverse effects. A hard shutdown should be avoided where possible, as this creates the situation where companies cannot retain staff, and the region will lose capability and capacity, as well as facing much higher costs and extended project timeframes due to staffing shortages and severely restricted ability to carry out works.	Allow	Amend policy P.P29 (a) to ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled	Reject
	Civil Contractors New Zealand	FS16.182	Woodridge Holdings Ltd	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Not stated	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. 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.	Allow	Delete policy and make earthworks greater than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	Civil Contractors New Zealand	FS35.032	Goodman Contractors Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	A hard shutdown of earthworks between 1 June and 30 September is inappropriate as many works may be able to be managed during this period with no adverse effects. A hard shutdown should be avoided where possible, as this creates the situation where companies cannot retain staff, and the region will lose capability and capacity, as well as facing much higher costs and extended project timeframes due to staffing shortages and severely restricted ability to carry out works.	Allow	Amend policy P.P29 (a) to ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled	Reject
	Civil Contractors New Zealand	FS32.018	PCL Contracting Ltd as part of CCNZ	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Not stated	Allow	Considers a hard shutdown of earthworks between 1 June and 30 September is inappropriate as many works may be able to be managed during this period with no adverse effects.	Accept
	Civil Contractors New Zealand	FS34.017	Orogen Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Refer to Orogen submission S239.004, S239.011, S239.012 & S239.019. A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approach to earthworks provides a better outcome for industry and compliance.	Allow	Delete policy and amend associated rules.	Accept
	Civil Contractors New Zealand	FS45.008	Kāinga Ora – Homes and Communities	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Kāinga Ora supports the deletion of this policy, or if amended, amendment to adequately provide for winter earthworks where potential sediment can be well managed.	Allow	Delete policy WH.P31  If amended, ensure sufficient and appropriate exemptions exist to provide some	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
										ability for winter earthworks in situations where potential sediment can be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'.	
	Civil Contractors New Zealand	FS47.346	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support in part	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow in part	Allow S285.031 by deleting Policy P.P29.	Accept
	Civil Contractors New Zealand	FS49.031	Multi Civil Contractors Ltd	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Not stated	Allow	Request that plan change does not go ahead	Reject
S285.032	Civil Contractors New Zealand (S285)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Not Stated		Notes that many earthworks activities undertaken by contractors working for local authority transport teams and Waka Kotahi have significant public benefits but would be unable to meet the permitted activity conditions of proposed Rule WH.R23, inclusive of minor repairs and maintenance of three waters infrastructure. Notes that a burst pipe may require resource consent as a restricted discretionary activity under Rule WH.R24 and this could lead to hundreds of resource consent applications per annum for minor earthworks activities. Concerns about capacity to perform this work.	Amend the definition of earthworks that governs Rule P.R22, to reinstate the exemptions for certain earthworks activities as exist for 'other Whaitua', including for the thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines. Any consequential amendments, to other relevant provisions, which are in general accordance with this request.		Reject
	Civil Contractors New Zealand	FS15.011	Construction Contracts Ltd	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support in part	Many earthworks activities undertaken by contractors working for local authority transport teams and Waka Kotahi have significant public benefits but would be unable to meet the permitted activity conditions of proposed Rule WH.R23, inclusive of minor repairs and maintenance of three waters infrastructure. Does council have capacity to consent this additional workload on a timely basis?	Allow in part	Amend the definition of earthworks that governs Rule P.R22, to reinstate the exemptions for certain earthworks activities as exist for 'other Whaitua', including for the thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines. Any consequential amendments, to other relevant provisions, which are in general accordance with this request.	Reject
	Civil Contractors New Zealand	FS35.033	Goodman Contractors Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support in part	Many earthworks activities undertaken by contractors working for local authority transport teams and Waka Kotahi have significant public benefits but would be unable to meet the permitted activity conditions of proposed Rule WH.R23, inclusive of minor repairs and maintenance of three waters infrastructure. Does	Allow in part	Amend the definition of earthworks that governs Rule P.R22, to reinstate the exemptions for certain earthworks activities as exist for 'other	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								council have capacity to consent this additional workload on a timely basis?		Whaitua', including for the thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines. Any consequential amendments, to other relevant provisions, which are in general accordance with this request.	
	Civil Contractors New Zealand	FS32.019	PCL Contracting Ltd as part of CCNZ	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Not stated	Allow	Notes that many earthworks activities undertaken by contractors working for local authority transport teams and Waka Kotahi have significant public benefits but would be unable to met the permitted activity conditions of proposed Rule WH.R23, inclusive of minor repairs and maintenance of three waters infrastructure. Notes that a burst pipe may require resource consent as a restricted discretionary activity under Rule WH.R24 and this could lead to hundreds of resource consent applications per annum for minor earthworks activities. Concerns about capacity to perform this work.	Reject
	Civil Contractors New Zealand	FS34.020	Orogen Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	See Orogen submission point S239.003	Allow	Review definition of 'earthworks' as it applies to these rules.	Reject
	Civil Contractors New Zealand	FS47.401	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Meridian agrees that some of the standards in the rule are impractical or unachievable;	Allow	Allow S285.032.	Reject
	Civil Contractors New Zealand	FS49.032	Multi Civil Contractors Ltd	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Not stated	Allow	Request that plan change does not go ahead	Reject
S285.033	Civil Contractors New Zealand (S285)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Not Stated		Strongly opposes and considers the shutdown of earthworks between 1 June and 30 September is inappropriate as works may be managed during this period with no adverse effects. Notes test methodologies should be appropriate to how monitoring occurs on site and the industry uses	Amend policy P.R23 (b), which is excessive. If amended, ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.	be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'. Amend to either specify which sort of test is used and leave this to implementation guidance, or refer to the correct on-site test method (NTU).		
	Civil Contractors New Zealand	FS15.012	Construction Contracts Ltd	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	The shutdown of earthworks between 1 June and 30 September is inappropriate as works may be managed during this period with no adverse effects. Notes test methodologies should be appropriate to how monitoring occurs on site and the industry use turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.	Allow	Amend policy P.R23 (b), which proposes inappropriate and excessive shutdown of earthworks over winter. Ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'. Amend to either leave this to implementation guidance specify which sort of test is used, or refer to the correct on-site test method (NTU)	Accept in part
	Civil Contractors New Zealand	FS35.034	Goodman Contractors Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	The shutdown of earthworks between 1 June and 30 September is inappropriate as works may be managed during this period with no adverse effects. Notes test methodologies should be appropriate to how monitoring occurs on site and the industry use turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.	Allow	Amend policy P.R23 (b), which proposes inappropriate and excessive shutdown of earthworks over winter. Ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'. Amend to either leave this to implementation guidance specify which sort of test is used, or refer to the correct on-site test method (NTU)	Accept in part
	Civil Contractors New Zealand	FS32.020	PCL Contracting Ltd as part of CCNZ	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted		Support	Not stated	Allow	Strongly opposes and considers the shutdown of earthworks between 1	Accept in part



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					discretionary activity.					June and 30 September is inappropriate as works may be managed during this period with no adverse effects. Notes test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.	
	Civil Contractors New Zealand	FS34.016	Orogen Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Refer to Orogen submission S239.004, S239.011, S239.012 & S239.019. A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approach to earthworks provides a better outcome for industry and compliance.	Allow	Delete policy and amend associated rules.	Reject
	Civil Contractors New Zealand	FS47.429	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support in part	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary. Meridian's preference is that clause (b) and related discretionary matter (8) are deleted;	Allow in part	Allow S285.033 by deleting clause (b) and related discretionary matter (8).	Reject
	Civil Contractors New Zealand	FS49.033	Multi Civil Contractors Ltd	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Not stated	Allow	Request that plan change does not go ahead	Reject
S286.060	Taranaki Whānui (S286)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Support		Support in principle.	Retain as notified.		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Taranaki Whānui	FS24.060	Rangitāne o Wairarapa	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Support	We support the entirety of the submission in relation to Chapter 8 and support Taranaki Whānui's right to self-determination as per Te Tiriti o Waitangi.	Allow	Retain provisions as notified or allow amendments as per the submission from Taranaki Whānui.	Accept in part
S286.061	Taranaki Whānui (S286)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Support		Support in principle.	Retain as notified.		Accept in part
	Taranaki Whānui	FS24.061	Rangitāne o Wairarapa	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Support	We support the entirety of the submission in relation to Chapter 8 and support Taranaki Whānui's right to self-determination as per Te Tiriti o Waitangi.	Allow	Retain provisions as notified or allow amendments as per the submission from Taranaki Whānui.	Accept in part
S286.062	Taranaki Whānui (S286)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Amend		Supports intent to avoid winter earthworks, but considers this issue can be addressed through consent conditions on an earthworks consent rather than requiring a separate consent.	Delete policy:  Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).		Accept
	Taranaki Whānui	FS8.033	Winstone Aggregates	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Winstone support the deletion of Policy WH.P31. Notwithstanding Winstone's concerns as detailed in Original Submission Point S206.048, Winstone agree that managing the timing of earthworks is best placed to a condition of consent.	Allow	Winstone seek that relief sought is allowed and Policy WH.P31 is deleted.	Accept
	Taranaki Whānui	FS16.099	Woodridge Holdings Ltd	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Not stated	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. 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.	Allow	Delete policy and make earthworks great than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	Taranaki Whānui	FS24.062	Rangitāne o Wairarapa	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	We support the entirety of the submission in relation to Chapter 8 and support Taranaki Whānui's right to self-determination as per Te Tiriti o Waitangi.	Allow	Retain provisions as notified or allow amendments as per the submission from Taranaki Whānui.	Accept
	Taranaki Whānui	FS36.052	Wellington City Council	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Consistent with Wellington City Council's position on the matter.	Allow	Not stated	Accept
	Taranaki Whānui	FS47.199	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S286.062 by deleting Policy WH.P31.	Accept
S286.087	Taranaki Whānui (S286)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Not Stated		Support in principle.	Retain as notified.		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Taranaki Whānui	FS24.087	Rangitāne o Wairarapa	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	We support the entirety of the submission in relation to Chapter 8 and support Taranaki Whānui's right to self-determination as per Te Tiriti o Waitangi.	Allow	Retain provisions as notified or allow amendments as per the submission from Taranaki Whānui.	Accept
S286.088	Taranaki Whānui (S286)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Not Stated		Supports intent to avoid winter earthworks, but notes this issue can be addressed through consent conditions in earthworks consents rather than requiring separate consents. Notes the winter shut down period is a matter of discretion under rule WH.R24 and therefore does not make sense to escalate to a non-complying activity under WH.R25.	Amend rule as follows:  Rule WH.R24: Earthworks – restricted discretionary activity.  Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met:  (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year.		Accept
	Taranaki Whānui	FS25.056	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Request is consistent with GTC submission; represents good planning practice as the submitter identifies the possibility of this clause can escalate the activity to a non-complying activity	Allow	Delete clause (b) of Rule WH.R24 regarding the earthworks winter shut down period	Reject
	Taranaki Whānui	FS24.088	Rangitāne o Wairarapa	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	We support the entirety of the submission in relation to Chapter 8 and support Taranaki Whānui's right to self-determination as per Te Tiriti o Waitangi.	Allow	Retain provisions as notified or allow amendments as per the submission from Taranaki Whānui.	Accept
	Taranaki Whānui	FS47.291	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;	Allow	Allow S286.088 by deleting clause (b) and related discretionary matter (8).	Reject
S286.089	Taranaki Whānui (S286)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-	Support		Support in principle	Retain as notified.		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					complying activity.						
	Taranaki Whānui	FS24.089	Rangitāne o Wairarapa	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Support	We support the entirety of the submission in relation to Chapter 8 and support Taranaki Whānui's right to self-determination as per Te Tiriti o Waitangi.	Allow	Retain provisions as notified or allow amendments as per the submission from Taranaki Whānui.	Reject
S288.022	China Forest Group Company New Zealand Ltd (S288)			2 Interpretation	Earthworks	Support		Avoids unintended capture in general earthworks rules	<p>Retain deferral of definition to the NES-PF/CF earthworks definition. <p>Align with NES-C.		Accept
	China Forest Group Company New Zealand Ltd	FS23.046	Forest & Bird	2 Interpretation	Earthworks		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S288.030	China Forest Group Company New Zealand Ltd (S288)			2 Interpretation	Stabilisation	Amend		Notes other methods are not included. Concerned PC1 proposes Schedule 34 ESC, that references methods from forest practices guides, but these are missed from the definition, which only includes GWRC ESC guideline 2021.	<p>Clarify relationship between earthworks and forestry earthworks. <span></span>		Reject
	China Forest Group Company New Zealand Ltd	FS23.054	Forest & Bird	2 Interpretation	Stabilisation		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S288.057	China Forest Group Company New Zealand Ltd (S288)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Oppose		Considers the policy sets up a confused pathway between the definitions, policy, general earthworks rules, and forestry earthworks under forestry rules.	<p>Clarify that the policy refers to general earthworks and does not apply to earthworks in forestry. Include new policy covering forestry earthworks and relate to the regulations of the NES-CF separation of earthworks. Objectively assess needs for stringency and utilise NES-CF as intended.		Accept
	China Forest Group Company New Zealand Ltd	FS23.081	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	China Forest Group Company New Zealand Ltd	FS25.110	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.		Support	Request for clarification that the policy relates to general earthworks and not commercial forestry and the request for a new policy covering commercial forestry is appropriate to implement the objectives of the NRP and represents good planning practice	Allow	Amend policy as requested by submitter and include a new policy covering commercial forestry earthworks consistent with the NES-CF	Accept
S288.058	China Forest Group Company New Zealand Ltd (S288)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Oppose		Considers the 100g/m3 standard is not related to actual sedimentation levels and is ill-suited to diffuse discharge from land. Notes the measurement method is retrospective rather than real-time. Considers the clarity rule has perverse outcomes, noting that	<p>Clarify that the policy refers to general earthworks and does not apply to earthworks in forestry.		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								plantation forests often have high macroinvertebrate indices.			
	China Forest Group Company New Zealand Ltd	FS23.082	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S288.059	China Forest Group Company New Zealand Ltd (S288)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose		Notes forestry continuously supplies feedstock for industry and markets and cannot be stopped. Notes earthworks are programmed to be done mainly over summer and drier periods, however the policy makes no provision, continuity, nor emergency and maintenance.	<p>Clarify that general earthworks do not apply to forestry. Earthworks for forestry to be to be undertaken under NES-CF.		Accept
	China Forest Group Company New Zealand Ltd	FS23.083	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S288.072	China Forest Group Company New Zealand Ltd (S288)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		Considers a 5m minimum setback from surface water bodies from earthworks is contrary to the objectives of the plan. Notes a permissive regime applies to areas under a farm plan and considers this a corollary to the NES-PF/CF. Considers sub-clauses (g) and (h) contradict all other rules, which recognise some discharge will happen.	<p>Align with NES-PF/CF 10m setbacks for perennial streams, set visual discharge standard recognising some discharge always likely to occur. Apply NES-PF/CF inclusive of discharge requirements to forestry, to avoid discriminatory differentiation between land uses.		Reject
	China Forest Group Company New Zealand Ltd	FS23.096	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	China Forest Group Company New Zealand Ltd	FS25.117	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support in part	The submitter makes a good point being the need to align earthworks associated with commercial forestry with the requirements of the NES-CF – this request is consistent with GTC's own submission seeking the provisions of the NES-CF to be relied on	Allow in part	Align earthworks associated with commercial forestry activities with the provisions of the NES-CF	Reject
S288.073	China Forest Group Company New Zealand Ltd (S288)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Oppose		Considers there is a lack of clarity, with potential crossover between policies and rules related to general earthworks and forestry earthworks. Notes there is no provision for emergency works in the earthworks season. Considers the proposed erosion risk method is relative and lacks meaningful accuracy and in-field applicability. Considers a quantitative connection has not been made between forestry activity and actual levels of sedimentation. Considers the need for, and benefit from, added stringency has not been evaluated. Considers the rules contravene the recommendations of the whaitua committees.	<p>Separate earthworks and align with NES-PF/CF.		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	China Forest Group Company New Zealand Ltd	FS23.097	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
	China Forest Group Company New Zealand Ltd	FS25.118	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support in part	The submitter makes a good point being the need to separate earthworks associated with commercial forestry that is already addressed by the NES-CF – this request is consistent with GTC's own submission seeking the provisions of the NES-CF to be relied on	Allow in part	Separate earthworks associated with commercial forestry activities from general earthworks and rely on NES-CF	Accept in part
S288.074	China Forest Group Company New Zealand Ltd (S288)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.	Oppose		Considers there is a lack of clarity, with potential crossover between policies and rules related to general earthworks and forestry earthworks. Notes there is no provision for emergency works in the earthworks season. Considers the proposed erosion risk method is relative and lacks meaningful accuracy and in-field applicability. Considers a quantitative connection has not been made between forestry activity and actual levels of sedimentation. Considers the need for, and benefit from, added stringency has not been evaluated. Considers the rules contravene the recommendations of the whaitua committees.	<p>Separate earthworks and align with NES-PF/CF.		Reject
	China Forest Group Company New Zealand Ltd	FS23.098	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept in part
S288.100	China Forest Group Company New Zealand Ltd (S288)			9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Oppose		Considers there is confusion between the definitions, policy, general earthworks rules, and forestry earthworks under forestry rules.	<p>Clarify that the policy refers to general earthworks and does not apply to earthworks in forestry. Include new policy covering forestry earthworks and relate to the regulations of the NES-CF separation of earthworks. Objectively assess needs for stringency and utilise NES-CF as intended.		Accept
	China Forest Group Company New Zealand Ltd	FS23.124	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S288.101	China Forest Group Company New Zealand Ltd (S288)			9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Oppose		Considers the 100g/m3 standard is not related to actual sedimentation levels and is ill-suited to diffuse discharge from land. Notes the measurement method is retrospective rather than real-time. Considers the clarity rule has perverse outcomes, noting that plantation forests often have high macroinvertebrate indices.	<p>Clarify that the policy refers to general earthworks and does not apply to earthworks in forestry.		Accept in part
	China Forest Group Company New Zealand Ltd	FS23.125	Forest & Bird	9 Te Awarua-o-	Policy P.P28: Discharge		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent	Disallow	Oppose the whole of the submission and all relief sought unless	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				Porirua Whaitua	standard for earthworks sites.			with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).		otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	
S288.102	China Forest Group Company New Zealand Ltd (S288)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose		Notes forestry continuously supplies feedstock for industry and markets and cannot be stopped. Notes earthworks are programmed to be done mainly over summer and drier periods, however the policy makes no provision, continuity, nor emergency and maintenance.	<p>Clarify that general earthworks do not apply to forestry. Earthworks for forestry to be to be undertaken under NES-CF.		Accept
	China Forest Group Company New Zealand Ltd	FS23.126	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
S288.116	China Forest Group Company New Zealand Ltd (S288)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Amend		Considers a 5m minimum setback from surface water bodies from earthworks is contrary to the objectives of the plan. Notes a permissive regime applies to areas under a farm plan and considers this a corollary to the NES-PF/CF. Considers clauses (g) and (h) contradict all other rules, which recognise some discharge will happen.	<p>Align with NES-PF/CF 10m setbacks for perennial streams, set visual discharge standard recognising some discharge always likely to occur. Apply NES-PF/CF inclusive of discharge requirements to forestry, to avoid discriminatory differentiation between land uses.		Reject
	China Forest Group Company New Zealand Ltd	FS23.140	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S288.117	China Forest Group Company New Zealand Ltd (S288)			9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.	Oppose		Considers there is a lack of clarity, with potential crossover between policies and rules related to general earthworks and forestry earthworks. Notes there is no provision for emergency works in the earthworks season. Considers the proposed erosion risk method is relative and lacks meaningful accuracy and in-field applicability. Considers a quantitative connection has not been made between forestry activity and actual levels of sedimentation. Considers the need for, and benefit from, added stringency has not been evaluated. Considers the rules contravene the recommendations of the whaitua committees.	<p>Separate earthworks and align with NES-PF/CF.		Reject
	China Forest Group Company New Zealand Ltd	FS23.141	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
S33.007	Wellington City Council (S33)			2 Interpretation	Earthworks	Support		Consistent with the WCC PDP definition of earthworks	Retain as notified		Accept
S33.053	Wellington City Council (S33)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Support		Supports as the policy is consistent with Wellington City Council's Proposed District Plan (PDP).	Retain as notified		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S33.054	Wellington City Council (S33)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Support		Supports as the policy is consistent with Wellington City Council's Proposed District Plan (PDP).	Retain as notified		Accept in part
S33.055	Wellington City Council (S33)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Support		Support, consistent with existing best practise.	Retain as notified		Reject
S33.071	Wellington City Council (S33)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		Supports in-part but considers subclause (g) cannot be met as you cannot guarantee that no sediment will leave the site or enter a waterbody, and that sediment is already managed by subclause (h). Also notes that minor earthworks could be captured by this rule as there is no scale associated with the control. Considers use of 'And' between (b) and (c) should be an 'Or'. The implication of the 'And' would require all activities that is not for erosion risk treatment plan for the farm, or to action in the farm environment plan for the farm would require a resource consent which is unreasonable.	Rule WH.R23: Earthworks – permitted activity Earthworks is a permitted activity, provided the following conditions are met: ... (b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and ... (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used for earthworks over 250m2 to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.		Accept in part
	Wellington City Council	FS16.141	Woodridge Holdings Ltd	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Not stated	Subclause (g) cannot be met as you cannot guarantee that no sediment will leave the site or enter a waterbody, and that sediment is already managed by subclause (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 lower rates, even when the earthworks area is stabilised. AS currently written no earthworks will meet the permitted activity criteria, regardless of size and treatment.	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."  Amend Items (c)(1v) and (c)(v) so that they allow an appropriate level of SS in any stormwater discharge. 50g/m3 to Schedule A sites and 100g/m3 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).	Accept in part
	Wellington City Council	FS47.252	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Meridian agrees that clause (g) is unachievable and unreasonable;	Allow	Allow S33.071.	Accept



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S33.072	Wellington City Council (S33)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Support		Consistent with Wellington City Council's PDP.	Retain as notified provided that the proposed amendments to WH.R23 is accepted.		Accept in part
S33.073	Wellington City Council (S33)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.	Support		Consistent with Wellington City Council's PDP.	Retain as notified.		Reject
S33.103	Wellington City Council (S33)			9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Support		Supports as the policy is consistent with Wellington City Council's Proposed District Plan (PDP).	Retain as notified		Accept in part
S33.104	Wellington City Council (S33)			9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Support		Supports as the policy is consistent with Wellington City Council's Proposed District Plan (PDP).	Retain as notified		Accept in part
S33.105	Wellington City Council (S33)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Not Stated		Support, consistent with existing best practise.	Retain as notified		Reject
S33.121	Wellington City Council (S33)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Amend		Supports in-part but considers subclause (g) cannot be met as you cannot guarantee that no sediment will leave the site or enter a waterbody, and that sediment is already managed by subcaluse (h). Also notes that minor earthworks could be captured by this rule as there is no scale associated with the control. Suggests use of 'And' between (b) and (c) should be an 'Or'. The implication of the 'And' would require all activities that is not for erosion risk treatment plan for the farm, or to action in the farm environment plan for the farm would require a resource consent which is unreasonable.	Rule WH.R23: Earthworks – permitted activity Earthworks is a permitted activity, provided the following conditions are met: ... (b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and ... (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used for earthworks over 250m2 to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.		Accept in part
	Wellington City Council	FS47.389	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Meridian agrees that clause (g) is unachievable and unreasonable;	Allow	Allow S33.121.	Accept
S33.122	Wellington City Council (S33)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Support		Consistent with Wellington City Council's PDP.	Retain as notified provided that the proposed amendments to P.R22 is accepted.		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S33.123	Wellington City Council (S33)			9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.	Support		Consistent with Wellington City Council's PDP.	Retain as notified		Reject
	Wellington City Council	FS47.430	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Oppose in part	Meridian considers the restriction on winter earthworks and default to non-complying activity rule is unreasonable and unnecessary;	Disallow in part	Disallow S33.123 and provide for winter works as a restricted discretionary activity.	Reject
S36.041	Wellington Branch of New Zealand Farm Forestry Association (S36)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P30: Discharge standard for earthworks.	Amend		Notes the rule does not apply to forestry. Considers the peak discharge limit too low and barely colours water. Considers a vehicle driving on a gravel road, even with small scale sediment raps in place by a culvert (as per NES-CF) and walking tracks in the Oronogorongo Valley would fail this test.	Raise discharge limits to 1000g/m3		Reject
S36.046	Wellington Branch of New Zealand Farm Forestry Association (S36)			9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Amend		Notes the rule does not apply to forestry. Considers the peak discharge limit too low and barely colours water. Considers a vehicle driving on a gravel road, even with small scale sediment raps in place by a culvert (as per NES-CF) and walking tracks in the Oronogorongo Valley would fail this test.	Raise discharge limits to 1000g/m3		Reject
S38.010	Summerset Group Holdings Limited (S38)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose		Opposes the requirement to seek a non-complying resource consent to undertake winter earthworks.Considers the S32 statement that there is higher risk for discharges of sediment over the winter period the incorrect. Suggests that large rain events, that can occur at any time, cause larger pulses of sediment . Suggests current practices for the management of winter earthworks managed through conditions of consent with oversight from Council monitoring staff be retained.	Delete policy:  Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).		Accept in part
	Summerset Group Holdings Limited	FS11.057	GILLIES GROUP MANAGEMENT LTD	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Agrees that the s32 statement that there is a higher risk for discharges of sediment over the winter months is incorrect.	Allow	Support submission point in full	Reject
	Summerset Group Holdings Limited	FS30.055	Pukerua Holdings Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Agrees that the s32 statement that there is a higher risk for discharges of sediment over the winter months is incorrect.	Allow	Support submission point in full	Reject
	Summerset Group Holdings Limited	FS47.176	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S38.010 by deleting Policy WH.P31.	Accept
S38.018	Summerset Group Holdings Limited (S38)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		Considers the 'and' after clause b was not intended to make earthworks not on a farm a consented activity	Amend rule as follows :  Rule WH.R23: Earthworks – permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									<p>exceed 3,000m<sup>2</sup> per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.</p> <p>Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).</p>		
	Summerset Group Holdings Limited	FS16.142	Woodridge Holdings Ltd	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Not stated	Subclause (g) cannot be met as you cannot guarantee that no sediment will leave the site or enter a waterbody, and that sediment is already managed by subclause (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 lower rates, even when the earthworks area is stabilised. AS currently written no earthworks will meet the permitted activity criteria, regardless of size and treatment.	Allow	<p>Amend to take into consideration these submissions including removal of the (iv) and the requirements that there no “no discharge of sediment from earthworks.”</p> <p>Amend Items (c)(1v) and (c)(v) so that they allow an appropriate level of SS in any stormwater discharge. 50g/m<sup>3</sup> to Schedule A sites and 100g/m<sup>3</sup> 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).</p>	Accept in part
S38.019	Summerset Group Holdings Limited (S38)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		Opposes the requirement to seek a non-complying resource consent to undertake winter earthworks. Considers the S32 statement that there is higher risk for discharges of sediment over the winter period to be incorrect. Suggests that large rain events, that can occur at any time, cause larger	<p>Amend rule as follows:</p> <p>Rule WH.R24: Earthworks – restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant</p>		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
								pulses of sediment . Suggests current practices for the management of winter earthworks managed through conditions of consent with oversight form Council monitoring staff be retained.	into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year.		
	Summerset Group Holdings Limited	FS47.262	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support in part	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and should be deleted (and considers the related discretionary matter (8) should also be deleted);	Allow in part	Allow S38.019 and delete the related discretionary matter (8).	reject
S38.025	Summerset Group Holdings Limited (S38)			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose		Opposes the requirement to seek a non-complying resource consent to undertake winter earthworks.Considers the S32 statement that there is higher risk for discharges of sediment over the winter period is incorrect. Suggests large rain events, that can occur at any time, cause larger pulses of sediment . Suggests current practices for the management of winter earthworks managed through conditions of consent with oversight from Council monitoring staff be retained.	Delete policy:  Policy P.P29: Winter shut down of earthworks Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).		Accept in part
	Summerset Group Holdings Limited	FS16.169	Woodridge Holdings Ltd	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Not stated	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.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.	Allow	Delete policy and make earthworks greater than 3,000m2 between 1 June and 30 September a Discretionary Activity.	Accept
	Summerset Group Holdings Limited	FS47.324	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S38.025.	Accept
S38.033	Summerset Group Holdings Limited (S38)			9 Te Awarua-o-	Rule P.R22: Earthworks –	Amend		Considers the ‘and’ after clause b was not intended to make earthworks not on a farm a consented activity.	Amend rule:  Rule P.R22: Earthworks – permitted		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				Porirua Whaitua	permitted activity.				<p>activity</p> <p>Earthworks is a permitted activity, provided the following conditions are met:</p> <p>(a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or</p> <p>(b) the earthworks are to implement an action in the farm environment plan for the farm, and or</p> <p>(c) the area of earthworks does not exceed 3,000m<sup>2</sup> per property in any consecutive 12-month period, and</p> <p>(d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and</p> <p>(e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and</p> <p>(f) the area of earthworks must be stabilised within six months after completion of the earthworks, and</p> <p>(g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and</p> <p>(h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.</p> <p>Note</p> <p>Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).</p>		
S38.034	Summerset Group Holdings Limited (S38)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Amend		<p>Opposes the requirement to seek a non-complying resource consent to undertake winter earthworks.Considers the S32 statement that there is higher risk for discharges of sediment over the winter period the incorrect. Suggests that large rain events, that can occur at any time, cause larger pulses of sediment.Suggests current practices for the management of winter earthworks managed through conditions of consent with oversight from Council monitoring staff be retained.</p>	<p>Amend rule:</p> <p>Rule P.R23: Earthworks – restricted discretionary activity</p> <p>Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met:</p> <p>(a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m<sup>3</sup>, except that, if at the time of the discharge the concentration of total</p>		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year.		
	Summerset Group Holdings Limited	FS16.229	Woodridge Holdings Ltd	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Not stated	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".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. 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.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 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.	Allow	Remove (b) from P.R23 and delete WH.R24 so that earthworks are a Discretionary Activity.	Reject
	Summerset Group Holdings Limited	FS47.402	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that the related discretionary matter (8) should also be deleted;	Allow	Allow S38.034 by deleting clause (b) and discretionary matter (8).	Reject
S41.001	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited (S41)			2 Interpretation	Earthworks	Amend		Supports the use of the National Planning Standards definition in principle but seeks exemptions for infrastructure from the Operative Natural Resources Plan definition are carried over into the relevant rules.	Retain definition as notified, and amend relevant rules to exempt infrastructure.		Accept
	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth),	FS23.148	Forest & Bird	2 Interpretation	Earthworks		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	One New Zealand Group Limited and Spark New Zealand Trading Limited									points and specific relief.	
	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited	FS47.047	Meridian Energy Limited	2 Interpretation	Earthworks		Support	The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Allow	Allow S41.001	Accept
S41.002	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited (S41)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R31: Change of rural land use – discretionary activity.	Oppose		This policy is linked to a rule which makes earthworks between June and September a non-complying activity. Telecommunications works are carried out year-round. Considers having to apply for consents to undertake these activities in this period will add significant costs and delays in the provision of telecommunication facilities. Concerned adverse weather in summer/autumn may result in significant lost time to safely undertake earthworks, and the winter period may be needed for projects to catch up on progress and stabilise the land. Considers any winter earthworks are dealt with through conditions of consent.	Delete policy:  Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).		Accept
	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited	FS8.002	Winstone Aggregates	8 Whaitua Te Whanganui-a-Tara	Rule WH.R31: Change of rural land use – discretionary activity.	Oppose	Support	This policy is linked to a rule which makes earthworks between June and September a non-complying activity. Telecommunications works are carried out year-round. Considers having to apply for consents to undertake these activities in this period will add significant costs and delays in the provision of telecommunication facilities. Concerned adverse weather in summer/autumn may result in significant lost time to safely undertake earthworks, and the winter period may be needed for projects to catch up on progress and stabilise the land. Considers any winter earthworks are dealt with through conditions of consent.	Allow	Winstone seeks to allow the deletion of Policy WH.P31.	Accept
	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited	FS23.149	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R31: Change of rural land use – discretionary activity.	Oppose	Oppose	This policy is linked to a rule which makes earthworks between June and September a non-complying activity. Telecommunications works are carried out year-round. Considers having to apply for consents to undertake these activities in this period will add significant costs and delays in the provision of telecommunication facilities. Concerned adverse weather in summer/autumn may result in significant lost time to safely undertake earthworks, and the winter period may be needed for projects to catch up on progress and stabilise the land. Considers any winter earthworks are dealt with through conditions of consent.	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Chorus New Zealand Limited, Connexa	FS28.005	Waka Kotahi NZ Transport Agency	8 Whaitua Te	Rule WH.R31: Change of	Oppose	Support	This policy is linked to a rule which makes earthworks between June and September a non-complying activity. Telecommunications works are carried out	Allow	Not stated	Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited			Whanganui-a-Tara	rural land use – discretionary activity.			year-round. Considers having to apply for consents to undertake these activities in this period will add significant costs and delays in the provision of telecommunication facilities. Concerned adverse weather in summer/autumn may result in significant lost time to safely undertake earthworks, and the winter period may be needed for projects to catch up on progress and stabilise the land. Considers any winter earthworks are dealt with through conditions of consent.			
S41.004	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited (S41)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Amend		Supports in principle the earthworks definition aligning with the National Planning Standards but notes this removes existing exemptions for telco infrastructure. States that telecommunication earthworks can easily exceed 3000sqm in 12 months due to their linear nature, but that the telco industry follows industry standard best practice for earthworks and these earthworks are low-impact. Considers these activities should be exempt to remove the need to apply for unnecessary consents which will add significant costs and delays and seeks an exclusion in the rule itself to comply with the National Planning Standards. Suggests the 'and' after clause b means that any earthworks that are not related to farming activities require consent no matter how small but that this is most likely an error in how the rule is drafted and should be corrected.	Amend rule as follows:  Rule WH.R23: Earthworks – permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.  Note This rule excludes: • thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance; and • the construction, repair, upgrade or maintenance of telecommunication structures or lines. Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land		Reject



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									Disturbing Activities in the Wellington Region (2021).		
	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited	FS20.001	Transpower New Zealand Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support in part	Transpower considers the exclusions sought for cable laying and pipe maintenance better recognises and provides for cable or pipe laying that may be associated with the maintenance, upgrading, or development of regionally significant infrastructure.	Allow in part	Transpower supports excluding “thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance” from earthworks rule WH.R23.	Reject
	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited	FS23.151	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird’s submission points and specific relief.	Accept
	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited	FS28.006	Waka Kotahi NZ Transport Agency	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Support	Changes proposed will improve clarity of the provisions.	Allow	Not stated	Reject
S41.005	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited (S41)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Amend		This rule makes earthworks between June and September a non-complying activity. Telecommunications works are carried out year-round. Considers having to apply for consents to undertake these activities in this period will add significant costs and delays in the provision of telecommunication facilities. Concerned adverse weather in summer/autumn may result in significant lost time to safely undertake earthworks, and the winter period may be needed for projects to catch up on progress and stabilise the land. Considers any winter earthworks are dealt with through conditions of consent.	Amend rule as follows:  Rule WH.R24: Earthworks – restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year.		
	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited	FS8.003	Winstone Aggregates	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Winstone agree with the concerns raised by the submitter which align with Winstone's original Submission Point S206.060. Note: The summary of the decision requested does not show the proposed deletion of clause (b).	Allow	Winstone seeks to allow the deletion of clause (b) of Rule WH.R24.	Reject
	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited	FS23.152	Forest & Bird	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited	FS47.263	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and should be deleted together with the related discretionary matter (8) which should also be deleted;	Allow	Allow S41.005 by deleting clause (b) and the related discretionary matter (8).	Reject
S41.006	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New			9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Oppose		This policy is linked to a rule which makes earthworks between June and September a non-complying activity. Telecommunications works are carried out year-round. Considers having to apply for consents to undertake these activities in this period will add significant costs and delays in the provision of telecommunication facilities. Concerned adverse weather in summer/autumn may result in significant lost time to safely undertake earthworks, and the winter period may be needed for projects to catch up on progress and stabilise the land. Considers any	Delete policy:  Policy P.P29: Winter shut down of earthworks Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional		Accept

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Zealand Trading Limited (S41)							winter earthworks are dealt with through conditions of consent.	Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).		
	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited	FS23.153	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Reject
	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited	FS47.325	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.		Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;	Allow	Allow S41.006.	Accept
S41.008	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited (S41)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Amend		Supports in principle the earthworks definition aligning with the National Planning Standards but notes this removes existing exemptions for telco infrastructure. States that telecommunication earthworks can easily exceed 3000sqm in 12 months due to their linear nature, but that the telco industry follows industry standard best practice for earthworks and these earthworks are low-impact. Considers these activities should be exempt to remove the need to apply for unnecessary consents which will add significant costs and delays and seeks an exclusion in the rule itself to comply with the National Planning Standards. Suggests the 'and' after clause b means that any earthworks that are not related to farming activities require consent no matter how small but that this is most likely an error in how the rule is drafted and should be corrected.	Amend rule as follows:  Rule P.R22: Earthworks – permitted activity Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (d) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									<p>network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.</p> <p>Note This rule excludes: -thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance; and -the construction, repair, upgrade or maintenance of telecommunication structures or lines. Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).</p>		
	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited	FS20.002	Transpower New Zealand Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support in part	Transpower considers the exclusions sought for cable laying and pipe maintenance better recognises and provides for cable or pipe laying that may be associated with the maintenance, upgrading, or development of regionally significant infrastructure.	Allow in part	Transpower supports excluding “thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance” from earthworks rule P.R22.	Reject
	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited	FS23.155	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird’s submission points and specific relief.	Accept
S41.009	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited (S41)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.	Amend		This rule makes earthworks between June and September a non-complying activity. Telecommunications works are carried out year-round. Considers having to apply for consents to undertake these activities in this period will add significant costs and delays in the provision of telecommunication facilities. Concerned adverse weather in summer/autumn may result in significant lost time to safely undertake earthworks, and the winter period may be needed for projects to catch up on progress and stabilise the land. Considers any winter earthworks are dealt with through conditions of consent.	Amend rule as follows:  Rule P.R23: Earthworks – restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									solids in the discharge from the earthworks shall not exceed 100g/m <sup>3</sup> , except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m <sup>3</sup> , the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) earthworks shall not occur between 1st June and 30th September in any year.		
	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited	FS23.156	Forest & Bird	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Oppose	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Accept
	Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited	FS47.403	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that the related discretionary matter (8) should also be deleted;	Allow	Allow S41.009 by deleting clause (b) and discretionary matter (8).	Reject
S42.009	Maryanne Gill (S42)			8 Whaitua Te Whanganui-a-Tara	8.2.4 Rural land use and earthworks	Oppose		Considers the earthworks provisions in PC1 are complicated and impossible for a "lay person " to adhere or understand. Considers in order for farmers to protect their land and stock, they need access land at all times because stock welfare is dependent on it (especially during calving and lambing seasons). Concerned GWRC want to ban earthworks for 4 months of the year and considers this disregards farm safety, stock welfare and farm tracks access.	Not stated.		Reject
S43.003	Fulton Hogan Ltd (S43)			2 Interpretation	Earthworks	Oppose		Opposes the use of different earthworks definitions in different parts of the region. Concern this will create confusion and be difficult to understand and implement.	For Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua only: The alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, and disturbance of land for the installation of fence		Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									<p>posts. Except that, for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20, 'earthworks' has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.</p> <p>For all other whaitua:</p> <p>The disturbance of a land surface from the time soil is first disturbed on a site until the time the site is stabilised.</p> <p>Earthworks includes blading, contouring, ripping, moving, removing, placing or replacing soil or earth, by excavation, or by cutting or filling operations, or by root raking.</p> <p>Earthworks do not include:</p> <p>(a) cultivation of the soil for the establishment of crops or pasture, and</p> <p>(b) the harvesting of crops, and</p> <p>(c) thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and</p> <p>(d) the construction, repair, upgrade or maintenance of:</p> <p>(i) pipelines, and</p> <p>(ii) electricity lines and their support structures, including the National Grid, and</p> <p>(iii) telecommunication structures or lines, and</p> <p>(iv) radio communication structures, and</p> <p>(v) firebreaks or fence lines, and</p> <p>(vi) a bore or geotechnical investigation bore, and</p> <p>(e) repair or maintenance of existing roads and tracks, and airfield runways, taxiways, and</p> <p>(f) maintenance of orchards and shelterbelts, and</p> <p>(g) domestic gardening, and</p> <p>(h) repair, sealing or resealing of a road, footpath, driveway, and</p> <p>(i) discharge of cleanfill material to a cleanfill area</p>		
	Fulton Hogan Ltd	FS47.048	Meridian Energy Limited	2 Interpretation	Earthworks		Oppose in part	Meridian seeks retention of the exclusions for infrastructure activities. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;	Disallow in part	Disallow the part of S43.001 that seeks deletion of the existing exclusions.	Reject
	Fulton Hogan Ltd	FS10.21	Enviro NZ Services Ltd (Enviro NZ)	2 Interpretation	Earthworks		Support	As per submission point	Allow	All	Accept
S43.012	Fulton Hogan Ltd (S43)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Support		Supports the use of good management practice. Considers that the policy provides for the implementation of appropriate controls.	Retain as notified		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
S43.013	Fulton Hogan Ltd (S43)			8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Oppose		Considers the policy is onerous, and does not recognise that winter earthworks may be feasible depending on other factors (location, soil types, slope). Seeks for greater flexibility in the policy, provided that activities are undertaken in accordance with the GWRC Erosion and Sediment Control Standard, and are managed and monitored.	Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, unless they can be staged or otherwise undertaken in a manner that avoids adverse effects on water quality, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).		Reject
	Fulton Hogan Ltd	FS25.096	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Oppose	The additional provisions sought to Policy WH.P31 regarding the winter shut down period are unnecessary and impracticable and do not represent good planning practice, and would not implement the NPS-FM or achieve the purpose of the RMA	Disallow	Delete Policy WH.P31 in its entirety, as sought by GTC in their submission	Accept
	Fulton Hogan Ltd	FS34.053	Orogen Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Refer to Orogen submission S239.012 & S239.019. A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approach to earthworks provides a better outcome for industry and compliance.	Allow	Delete policies and amend associated rules.	Accept
	Fulton Hogan Ltd	FS47.177	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Oppose in part	Meridian agrees the blanket approach of the policy is inappropriate, particularly for projects to establish or upgrade regionally significant infrastructure, and considers the policy should be deleted, not amended, because there are other operative policies that already provide for the flexibility proposed by the submitter;	Disallow in part	Disallow S43.013 by deleting (not amending) Policy WH.P31.	Accept
	Fulton Hogan Ltd	FS10.39	Enviro NZ Services Ltd (Enviro NZ)	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.		Support	Refer to submission point	Allow	All	Accept
S43.016	Fulton Hogan Ltd (S43)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.	Oppose		Considers there are many instances where earthworks can be undertaken without adverse effects during winter months. Considers that small scale road maintenance projects would require resource consent due to being considered “earthworks”, which would not be feasible to undertake during winter months or completely avoid sediment run-off. Considers the standard requiring no sediment discharge is unreasonable. Concerned with cost implications of resource consent being required for a large number of earthworks during winter months, regardless of their scale, and that environmental gains will be trivial.	Rule WH.R23: Earthworks – permitted activity Earthworks and the associated discharge of sediment and/or flocculant is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (i) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (ii) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									(iii) the area of earthworks must be stabilised within six months after completion of the earthworks, and (iv) there is no discharge of sediment from earthworks and/or flocculant from areas greater than 25 m2 into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (v) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.		
	Fulton Hogan Ltd	FS47.253	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks – permitted activity.		Oppose in part	Meridian agrees the rule should include associated discharges (including discharges of sediment and/or flocculant) and opposes in its entirety clause (g);	Disallow in part	Allow S43.016 in part by providing for associated discharges in the chapeau to the rule and delete clause (g).	Accept in part
S43.017	Fulton Hogan Ltd (S43)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.	Oppose		Considers there are many instances where earthworks can be undertaken without adverse effects during winter months. Considers that small scale road maintenance projects would require resource consent due to being considered “earthworks”, which would not be feasible to undertake during winter months or completely avoid sediment run-off. Considers the rule is out of step with Policy WH.P31 and is more stringent than the policy directs, noting that the rule applies to all earthworks regardless of scale. Concerned with cost implications of resource consent being required for a large number of earthworks during winter months, regardless of their scale, and that environmental gains will be trivial.	Rule WH.R24: Earthworks – restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) (i) earthworks with less than 3,000 m2 of disturbed area at any one time which intend to work between 1st June and 30th September in any year must prepare a site specific winter earthworks plan, which shall be provided to Greater Wellington Regional Council as part of this application for resource consent; (ii) earthworks which exceed 3,000 m2 of disturbed area at any one time shall not occur between 1st June and 30th September in any year.		Reject



Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
	Fulton Hogan Ltd	FS25.097	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Oppose	The additional provisions sought to Clause (b) regarding the winter shut down period are unnecessary and impracticable and do not represent good planning practice, and would not implement the NPS-FM or achieve the purpose of the RMA	Disallow	Delete clause (b) from Rule WH.R24 regarding the earthworks winter shut down period	Reject
	Fulton Hogan Ltd	FS47.264	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks – restricted discretionary activity.		Support in part	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and considers it should be deleted together with the related discretionary matter (8) which should also be deleted;	Allow in part	Allow S43.017 by deleting clause (b) and the related discretionary matter (8).	Reject
S43.018	Fulton Hogan Ltd (S43)			8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.	Oppose		Considers there are many instances where earthworks can be undertaken without adverse effects during winter months. Considers that small scale road maintenance projects would require resource consent due to being considered “earthworks”, which would not be feasible to undertake during winter months or completely avoid sediment run-off. Considers the rule out of step with Policy WH.P31 and is more stringent than the policy directs. Concerned with cost implications of resource consent being required for a large number of earthworks during winter months, regardless of their scale, and that environmental gains will be trivial. Considers the non-complying activity status too restrictive given the number of activities that would be captured under Rule WH.R25.	Alter Rules WH.R23, WH.R24 and WH.R25 to provide for low level activities, rather than requiring a non-complying activity status consent for all earthworks between 1 June and 30 September where any run-off occurs. This could be provided alongside additional oversight and control of erosion and sediment control plans by Council so that Council has additional certainty over the measures and mitigation proposed.		Accept in part
	Fulton Hogan Ltd	FS28.090	Waka Kotahi NZ Transport Agency	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Support	A more permissive activity status reflecting actual effects and known mitigation is appropriate.	Allow	Not stated	Accept
	Fulton Hogan Ltd	FS34.056	Orogen Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Support	Refer to Orogen submission S239.012 & S239.019. A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approach to earthworks provides a better outcome for industry and compliance.	Allow	Delete policies and amend associated rules.	Reject
	Fulton Hogan Ltd	FS47.293	Meridian Energy Limited	8 Whaitua Te Whanganui-a-Tara	Rule WH.R25: Earthworks – non-complying activity.		Support in part	Meridian agrees the non-complying activity status is not necessary or appropriate;	Allow in part	Allow S43.018 in part by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.	Reject
S43.024	Fulton Hogan Ltd (S43)			9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Support		Supports the use of good management practice. Considers that the policy provides for the implementation of appropriate controls.	Retain as notified		Accept in part
S43.025	Fulton Hogan Ltd (S43)			9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.	Oppose		Considers the policy is onerous, and does not recognise that winter earthworks may be feasible depending on other factors (location, soil types, slope). Seeks for greater flexibility in the policy, provided that activities are undertaken in accordance with the GWRC Erosion and Sediment Control Standard, and are managed and monitored.	Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, unless they can be staged or otherwise undertaken in a manner that avoids adverse effects on		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
									water quality, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).		
	Fulton Hogan Ltd	FS34.055	Orogen Limited	9 Te Awarua-o-Porirua Whaitua	Policy P.P28: Discharge standard for earthworks sites.		Support	Refer to Orogen submission S239.012 & S239.019. A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approach to earthworks provides a better outcome for industry and compliance.	Allow	Delete policies and amend associated rules.	Accept
S43.028	Fulton Hogan Ltd (S43)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Oppose		Considers there are many instances where earthworks can be undertaken without adverse effects during winter months. Considers that small scale road maintenance projects would require resource consent due to being considered “earthworks”, which would not be feasible to undertake during winter months or completely avoid sediment run-off. Considers the standard requiring no sediment discharge is unreasonable. Concerned with cost implications of resource consent being required for a large number of earthworks during winter months, regardless of their scale, and that environmental gains will be trivial.	Rule P.R22: Earthworks – permitted activity Earthworks and the associated discharge of sediment and/or flocculant is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, and or (c) the area of earthworks does not exceed 3,000m2 per property in any consecutive 12-month period, and (i) the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (ii) soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and (iii) the area of earthworks must be stabilised within six months after completion of the earthworks, and (iv) there is no discharge of sediment from earthworks and/or flocculant from areas greater than 25 m2 into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and (v) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.		Accept in part
	Fulton Hogan Ltd	FS47.390	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Oppose in part	Meridian agrees the rule should include associated discharges (including discharges of sediment and/or flocculant) and opposes in its entirety clause (g);	Disallow in part	Allow S43.028 in part by providing for associated discharges in the chapeau to the rule and deleting clause (g).	Accept in part
S43.029	Fulton Hogan Ltd (S43)			9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted	Oppose		Considers there are many instances where earthworks can be undertaken without adverse effects during winter months. Considers that small scale road maintenance projects would require resource consent	Rule WH.R24: Earthworks – restricted discretionary activity Earthworks and the associated discharge of sediment and/or flocculant		Accept in part

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
					discretionary activity.			due to being considered “earthworks”, which would not be feasible to undertake during winter months or completely avoid sediment run-off. Considers the rule is out of step with Policy P.28 and is more stringent than the policy directs, noting that the rule applies to all earthworks regardless of scale. Concerned with cost implications of resource consent being required for a large number of earthworks during winter months, regardless of their scale, and that environmental gains will be trivial.	into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met: (a) the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m3, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and (b) (i) earthworks with less than 3,000 m2 of disturbed area at any one time which intend to work between 1st June and 30th September in any year must prepare a site specific winter earthworks plan, which shall be provided to Greater Wellington Regional Council as part of this application for resource consent; (ii) earthworks which exceed 3,000 m2 of disturbed area at any one time shall not occur between 1st June and 30th September in any year.		
	Fulton Hogan Ltd	FS47.404	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks – restricted discretionary activity.		Oppose in part	Meridian agrees with the reasons for S43.029 and S43.030 but does not agree with the proposed amendment. Meridian also considers the related discretionary matter (8) should also be deleted;	Disallow in part	Disallow S43.029 and S43.030 and delete clause (b) and discretionary matter (8).	Reject
S43.030	Fulton Hogan Ltd (S43)			9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.	Oppose		Considers there are many instances where earthworks can be undertaken without adverse effects during winter months. Considers that small scale road maintenance projects would require resource consent due to being considered “earthworks”, which would not be feasible to undertake during winter months or completely avoid sediment run-off. Considers the rule out of step with Policy P.28 and is more stringent than the policy directs. Concerned with cost implications of resource consent being required for a large number of earthworks during winter months, regardless of their scale, and that environmental gains will be trivial. Considers the non-complying activity status too restrictive given the number of activities that would be captured under Rule P.R25.	Alter Rules P.R22, P.R23 and P.R24 to provide for low level activities, rather than requiring a non-complying activity status consent for all earthworks between 1 June and 30 September where any run-off occurs. This could be provided alongside additional oversight and control of erosion and sediment control plans by Council so that Council has additional certainty over the measures and mitigation proposed.		Accept in part
	Fulton Hogan Ltd	FS34.054	Orogen Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Support	Refer to Orogen submission S239.012 & S239.019. A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approach to earthworks provides a better outcome for industry and compliance.	Allow	Delete policies and amend associated rules.	Reject
	Fulton Hogan Ltd	FS47.405	Meridian Energy Limited	9 Te Awarua-o-	Rule P.R24: Earthworks – non-		Oppose in part	Meridian agrees with the reasons for S43.029 and S43.030 but does not agree with the proposed	Disallow in part	Disallow S43.029 and S43.030 and delete clause (b) and	Reject

Original submission point (SP)	Original submitter	Further submission point (FS)	Further submitter	Plan section	Provision	SP position	FS position	Reasons	Decision requested	FS decision sought	Officer recommendation
				Porirua Whaitua	complying activity.			amendment. Meridian also considers the related discretionary matter (8) should also be deleted;		discretionary matter (8).	
	Fulton Hogan Ltd	FS47.431	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R24: Earthworks – non-complying activity.		Support in part	Meridian agrees the non-complying activity status is not necessary or appropriate and agrees that provision should be made for winter earthworks as a restricted discretionary activity;	Allow in part	Allow S43.030 in part by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.	Reject
S94.012	Jo McCready (S94)			9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.	Amend		Considers conditions are arbitrary with no factual basis. Considers the size of earthworks have no relation to property size. Considers weather window irrelevant as bad weather can occur at anytime of year.	Amend/remove these conditions.		Reject
	Jo McCready	FS47.391	Meridian Energy Limited	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks – permitted activity.		Support	Meridian considers that clause (g) is unachievable and unreasonable;	Allow	Allow S94.012 by deleting clause (g).	Reject