

RMA Form 6

Further submission – Proposed Porirua District Plan

Clause 8 of First Schedule, Resource Management Act 1991

To: Porirua City Council
Email to: dpreview@porirua.govt.nz
Subject: Further submission - PDP
Post: Proposed District Plan, Environment and City Planning, Porirua City Council, PO Box 50-218, PORIRUA CITY
Delivery: Ground Floor, Council Administration Building, Cobham Court, Porirua City, marked "Attention: Proposed District Plan, Environment and City Planning"

Closing date for further submissions is 5pm Tuesday, 11 May 2021

Submissions, a summary of decisions requested and submitter contact details can be viewed at:

www.porirua.govt.nz/proposeddistrictplan

Further Submitter Contact Details			
Full Name	<i>Last Name</i>		<i>First Name</i>
	Hickman		Matthew
	<i>[insert additional rows if needed]</i>		
Or Company/Organisation Name <i>if applicable</i>	Greater Wellington Regional Council		
Contact Person <i>if different</i>	Fleur Matthews		
Email Address for Service	Fleur.matthews@gw.govt.nz		
Address	100 Cuba Street		
	WELLINGTON	6011	
Mail Address for Service <i>if different</i>	PO Box 11646 Manners Street WELLINGTON 6142		
Phone	<i>Mobile</i>	<i>Home</i>	<i>Work</i>
	021 306 951		
Attendance and wish to be heard at the hearing: <i>you must fill in both rows below</i>			
<input type="checkbox"/> I do not wish <input checked="" type="checkbox"/> I wish To be heard in support of my further submission <i>(Please tick relevant box)</i>			
<input checked="" type="checkbox"/> I will <input type="checkbox"/> I will not consider presenting a joint case with other submitters, who make a similar further submission, at a hearing. <i>(Please tick relevant box)</i>			

Relevance - you must select one box that applies to you:

- I am a person representing a relevant aspect of the public interest
- I am a person who has an interest in the proposal that is greater than the interest the general public has
- I am the local authority for the relevant area

Explain/specify the grounds for saying that you come within this category (you must fill this in):

Greater Wellington Regional Council is the regional authority for the area of Porirua City District.

Note to person making further submission:

A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy note:

When a person or group makes a submission or further submission on the Proposed District Plan this is public information. Please note that by making a submission your personal details, including your name and addresses will be made publicly available under the Resource Management Act 1991. This is because, under the Act, any further submission supporting or opposing your submission must be forwarded to you as well as to PCC. There are limited circumstances when your submission or your contact details can be kept confidential. If you consider you have reasons why your submission or your contact details should be kept confidential please contact the Environment & City Planning Team at dpreview@poriruacity.govt.nz.

Signature of person making further submission
(or person authorised to sign on behalf of
person making further submission)

Matthew Hickman, Manager Environmental Policy

Date: 11 May 2021

(A signature is not required if you make your submission by electronic means.)

Your further submission:

Please complete section below and insert additional rows per submission point or submitter if required

Submitter Name/ Submission Number	Submitter Address/Email	Support or Oppose	The particular parts of the submission I support or oppose are:	The reasons for my support or opposition are:	Allow or disallow	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
Porirua City Council 11.1	dpreview@pcc.govt.nz	Support	Submitter has requested that reference to 10% and 1% rainfall Annual Exceedance Probability events be added to the definition of "hydraulic neutrality" to enable the definition to be properly applied. The proposed additional wording was omitted by error.	GWRC supports the amended wording, and the requirement to meet hydraulic neutrality for 10% and 1% Annual Exceedance Probability events.	Allow	GWRC supports the amended wording.
Porirua City Council 11.5	dpreview@pcc.govt.nz	Support	Submitter has requested that the policy INF-P13 <i>Upgrading and development of the transport network</i> does not currently specifically address rubbish collection space within the road reserve.	GWRC agrees that inadequate space for refuse and recycling collection may have adverse effects on the safety and efficiency of the operation of the road, impact on the ability of Council to undertake collection services, and could have environmental impacts from dumping and windblown rubbish issues.	Allow	GWRC supports the amendment to the policy.
Porirua City Council 11.26	dpreview@pcc.govt.nz	Support	Submitter has requested changes to THWT-S1 <i>Stormwater detention tanks</i> to provide greater flexibility for developments through referencing the Wellington Water Standards, rather than requiring a rainwater tank as the only acceptable hydraulic neutrality device.	GWRC supports this amendment as it provides greater flexibility for achieving hydraulic neutrality.	Allow	GWRC supports the suggested changes.
Porirua City Council 11.34, 11.35	dpreview@pcc.govt.nz	Support	Submitter has requested changes to NH-P2 <i>Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities within the High Hazard Areas</i> and NH-P3 <i>Hazard-Sensitive Activities within the Medium Hazard Areas</i> to ensure that redevelopment of existing activities can occur within these zones.	GWRC supports the changes proposed to make these policies better able to be implemented. However, GWRC considers that the policies need to make a distinction between new development and additions to existing development.	Allow	GWRC suggests that further distinction be made to distinguish between new development and additions to existing development. The inclusion of: " <u>There will be a reduction in risk to people's lives and wellbeing</u> " would be best applied to existing development. Any new development in hazard areas will result in an increase in risk. GWRC suggests another point be added to require no increase in risk for new development (as a result of having incorporated appropriate mitigation measures).
Porirua City Council 11.36	dpreview@pcc.govt.nz	Support	Submitter has requested changes to the wording regarding setback distances around faults in NH-R6 <i>Any Hazard-Sensitive Activity and Potentially-Hazard-Sensitive Activity and associated buildings in Low Hazard Areas in a Natural Hazard Overlay</i> .	GWRC agrees that including a 20 m setback from a fault rupture zone is double counting, and the setbacks should apply within the fault zone not from it. However, GWRC notes that there are differences in the certainty of the location of faults in the Porirua district. In particular, in the location of the Ohariu Fault through the Porirua CBD which is classified as uncertain but constrained with an area approx. 100-200 m wide. A fault could occur anywhere in this zone. Compare that to well-defined sections of the Ohariu and Pukerua Faults that have much better certainty.	Allow	GWRC supports the changes proposed. GWRC suggests that PCC consider including a provision that allows geotechnical investigations within these zones to more precisely identify where the fault is and better define the 20 m setback zone.

Submitter Name/ Submission Number	Submitter Address/Email	Support or Oppose	The particular parts of the submission I support or oppose are:	The reasons for my support or opposition are:	Allow or disallow	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
Porirua City Council 11.39	dpreview@pcc.govt.nz	Support	Submitter has requested that the wording of the introduction of the <i>ECO – Ecosystems and Indigenous Biodiversity</i> section be amended to include an advisory statement that the management of wetlands is a function of GWRC and directing plan users to the PNRP and NES-FW.	GWRC supports the intent of the submission but considers that the wording could be improved for clarity.	Allow	GWRC supports the intent of the introduction but considers that the wording could be further amended for clarity.
Porirua City Council 11.42	dpreview@pcc.govt.nz	Oppose	Submitter has requested that ECO-R1 and ECO-R4 be amended as the construction of walking tracks is covered by the Infrastructure Chapter.	GWRC opposes this change as the construction of walking or cycling tracks in these areas is requires greater oversight within SNAs. As noted in GWRC's submission, this activity should be a controlled or restricted discretionary activity so that there is greater oversight. By including this activity within the infrastructure chapter there is a risk that the objectives of NE-O1 and NE-O2 will not be achieved.	Disallow	GWRC seeks this activity to be a controlled or restricted discretionary activity, and questions whether it should be located within the infrastructure chapter.
Porirua City Council 11.44	dpreview@pcc.govt.nz	Support	Submitter has requested that the title of ECO-R6 be amended.	We agree that the title of the rule should be amended to provide clarity for plan users on where the rule applies.	Allow	Allow.
Porirua City Council 11.46	dpreview@pcc.govt.nz	Oppose	Submitter has requested that ECO-R9 (as the "Catch-all rule") should be discretionary to be consistent with other overlays.	GWRC opposes this as given the status of SNAs in section 6(c) of the RMA, it is appropriate that the catch all rule be a non-complying activity, and more stringent than other overlays.	Disallow	GWRC seeks this rule be retained as a non-complying activity.
Porirua City Council 11.47	dpreview@pcc.govt.nz	Support	Submitter has requested amendments to ECO-S1 <i>Trimming, pruning or removal where there is imminent threat to the safety of people or property</i> for clarity and consistency.	We agree with the proposed amendments to the standards.	Allow	Allow.
Porirua City Council 11.51	dpreview@pcc.govt.nz	Oppose	Submitter has requested that NFL-R12 (as the "Catch-all rule") should be discretionary to be consistent with other overlays.	GWRC opposes this as given the status of ONFLs in section 6(b) of the RMA, it is appropriate that the catch-all rule be a non-complying activity, and more stringent than other overlays.	Disallow	GWRC seeks this rule be retained as a non-complying activity.
Porirua City Council 11.52	dpreview@pcc.govt.nz	Support	Submitter has requested to amend policy <i>CE-P13 Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities in the Medium Hazard Areas</i> to allow an appropriate consenting pathway.	Risk cannot be fully avoided but it can be minimised or reduced.	Allow	GWRC supports the proposed amendment but notes that there is a difference in how this policy would apply to new versus existing development. Changes to existing development can incorporate design and mitigation measures to reduce the risk but any new development in a hazard area will increase the risk to that development.
Porirua City Council 11.53	dpreview@pcc.govt.nz	Support	Submitter has requested to amend policy <i>CE-P14 Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities in the High Hazard Areas</i> to allow an appropriate consenting pathway.	Risk cannot be fully avoided but it can be minimised or reduced.	Allow	GWRC supports the proposed amendment but notes that there is a difference in how this policy would apply to new versus existing development. Changes to existing development can incorporate design and mitigation measures to reduce the risk but any new development in a hazard area will increase the risk to that development.
Porirua City Council 11.54	dpreview@pcc.govt.nz	Oppose	Submitter has requested that CE-R1 <i>Earthworks within a Coastal High Natural Character Area</i> is amended to remove reference to track construction as this is covered in the Infrastructure Chapter.	GWRC seeks for earthworks within a coastal high natural character area for the purposes of track construction to be either controlled or restricted discretionary activity.	Disallow	Allow only to the extent that the relief sought in submission point 137.63 is granted.

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Porirua City Council 11.55	dpreview@pcc.govt.nz	Support	Submitter has requested that CE-R2 <i>Vegetation removal within a Coastal High Natural Character Area</i> be amended to apply only to indigenous vegetation removal. Submitter also requested amendment to remove reference to track construction as this is covered in the Infrastructure Chapter.	GWRC supports the changes proposed. We note however that submission points 137.53 and 137.54 seek the removal of ECO-R2 and amendments to rules in ECO Chapter to change 'indigenous vegetation' to 'vegetation'.	Allow	Allow.
Spark New Zealand Trading Limited, Chorus New Zealand Limited, Vodafone New Zealand Limited 51.26	tom@incite.co.nz	Oppose	Submitter has requested that INF-P23 <i>Upgrades to and new infrastructure in Natural Hazards Overlays and Coastal Hazard Overlays</i> be amended to remove requirement for infrastructure be not vulnerable to the natural hazard, and be designed to maintain reasonable and safe operation during and in the immediate period after a natural hazard event.	This change appears to alter the intent of the policy.	Disallow	GWRC seeks that part of the submission requesting this policy amendment be disallowed.
Kenepuru Limited Partnership 59.1	Brett.Gawn@calibregroup.com	Oppose	Submitter has requested an amendment to the Fault Avoidance Zone in the planning maps to reflect a report submitted as part of a project agreed with PCC.	We support the Fault Avoidance Zone as notified.	Disallow	Seek that part of the submission requesting this amendment to the fault avoidance zone be disallowed.
Kenepuru Limited Partnership 59.8	Brett.Gawn@calibregroup.com	Oppose	Submitter has requested that SUB-R8 be amended to remove non-complying activity status for subdivisions where the building platform would be located within a High Hazard Area.	This change in rule status is inappropriate in areas identified as high hazard. We support the robust science which has identified these areas prone to natural hazards.	Disallow	GWRC seeks that the non-complying rule status for activities in high hazard areas is retained as notified.
Kenepuru Limited Partnership 59.9	Brett.Gawn@calibregroup.com	Oppose	Submitter has requested that SUB-R9 be amended to remove non-complying activity status for subdivisions where the building platform would be located within a High Hazard Area.	This change in rule status is inappropriate in areas identified as high hazard. We support the robust science which has identified these areas prone to natural hazards.	Disallow	GWRC seeks that the non-complying rule status for activities in high hazard areas is retained as notified.
Kenepuru Limited Partnership 59.12	Brett.Gawn@calibregroup.com	Oppose	Submitter has requested that INF-P23 <i>Upgrades to and new infrastructure in Natural Hazards Overlays and Coastal Hazard Overlays</i> be amended so that infrastructure must be "designed to be resilient" rather than "not vulnerable".	This change appears to alter the intent of the policy.	Disallow	GWRC seeks that part of the submission requesting this policy amendment be disallowed.
Kenepuru Limited Partnership 59.25	Brett.Gawn@calibregroup.com	Oppose	Submitter has requested that EW-O1 be amended to take into consideration the natural landform, rather than minimise changes to natural landforms.	The change requested would significantly weaken the policy direction, which currently seeks to minimise changes to natural landforms.	Disallow	GWRC seeks that the part of the submission requesting this objective amendment be disallowed.
Transpower New Zealand Ltd 60.50, 60.63, 60.64	pauline.whitney@boffamiskell.co.nz	Oppose	Submitter has requested amendments to INF-S18 <i>Trimming, pruning or removal of indigenous vegetation within an area identified in SCHED7 – Significant Natural Areas</i> and INF-S20 <i>Earthworks within an area identified in SCHED7 – Significant Natural Areas</i> to exclude the National Grid from these standards.	GWRC does not support Transpower being exempt from INF-S18 and INF-S20 for operation, maintenance and upgrading of the National Grid, including associated access tracks. INF-S18 already does not apply to works that are being undertaken in accordance with the Electricity (Hazards from Trees) Regulations 2003.	Disallow	GWRC seeks that INF-S18 and INF-S20 are retained as notified.
Transpower New Zealand Ltd 60.75	pauline.whitney@boffamiskell.co.nz	Oppose	Submitter requests that ECO-P11 <i>Earthworks within Significant Natural Areas</i> does not apply to the National Grid.	GWRC does not support the National Grid being exempt from the earthworks provisions in Significant Natural Areas.	Disallow	GWRC seeks that ECO-P11 applies to the National Grid.

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Transpower New Zealand Ltd 60.76	pauline.whitney@boffamiskell.co.nz	Oppose	Submitter has requested that ECO-P12 <i>Significant Natural Areas within the coastal environment</i> does not apply to the National Grid.	GWRC does not support the National Grid being exempt from ECO-P12, as this policy implements the New Zealand Coastal Policy Statement and protects the values in Significant Natural Areas.	Disallow	GWRC seeks that ECO-P12 applies to the National Grid.
Transpower New Zealand Ltd 60.92	pauline.whitney@boffamiskell.co.nz	Support	Submitter has requested that EW-O1 <i>Earthworks</i> be amended to require adverse effects on the National Grid to be avoided rather than minimised.	GWRC supports the need to avoid adverse effects on the National Grid.	Allow	GWRC seeks that EW-O1 is amended as suggested.
Heritage NZ Pouhere Taonga 65.2	draymond@heritage.org.nz	Oppose	Submitter has requested that the definition of heritage values be amended.	The heritage values listed in the notified definition reflect the criteria in Policy 21 of the Regional Policy Statement.	Disallow	Seek that part of the submission requesting an amendment to the definition of heritage values be disallowed.
Housing Action Porirua 67.17	redmarting@gmail.com	Support	Submitter has requested that REE-O5 <i>Resource efficiency</i> is amended to encourage recovery and recycling of building materials when existing buildings are demolished.	GWRC supports efforts to reduce the quantity of waste in the region, and this is consistent with Objective 11 and Policy 65 of the RPS.	Allow	GWRC seeks that recovery and recycling of building materials are included in REE-O5. However the specific wording and policy framework may need to be considered.
Paremata Business Park Ltd 69.1, 69.24	linda.bruwer@cuttriss.co.nz	Oppose	Submitter has requested that Policy CE-P14 <i>Hazard-Sensitive Activities and Potentially- Hazard-Sensitive Activities in the High Hazard Areas</i> be amended to provide for activities in high hazard areas where the risk is mitigated.	The risk-based natural hazard policy framework is suitably nuanced to: <ul style="list-style-type: none"> • allow appropriate development in hazard overlays providing suitable measures have been incorporated; and • avoid development where the risk is intolerable. 	Disallow	GWRC seeks to retain the inclusion of an avoidance option in the natural hazard provisions framework.
Survey + Spatial New Zealand (Wellington Branch) 72.18, 72.21, 72.23, 72.26, 72.30	nzisplanning.wgtn@gmail.com	Oppose	Submitter has requested that hydraulic neutrality should only be mandatory for up to a 10 year event (10% AEP). This would have implications for THWT-O1, THWT-P1, THWT-S2 and SUB-S6.	GWRC disagrees that hydraulic neutrality should only be mandatory for up to a 10 year event.	Disallow	GWRC seeks to retain the requirement for hydraulic neutrality.
Survey + Spatial New Zealand (Wellington Branch) 72.19	nzisplanning.wgtn@gmail.com	Oppose	Submitter has requested the deletion of EW-S5.	Retaining sediment onsite is an important standard to include for all zones. The discharge of sediment to sensitive receiving environments such as Porirua Harbour and Pāuatahanui Inlet is an issue that requires further action from both Councils (PCC and GWRC).	Disallow	Disallow.
Survey + Spatial New Zealand (Wellington Branch) 72.22	nzisplanning.wgtn@gmail.com	Support	Submitter has requested that THWT-R1 <i>Rainwater tanks for new buildings (excluding residential accessory buildings)</i> provides for mechanisms other than rainwater tanks to achieve stormwater neutrality.	GWRC agrees that there are mechanisms other than rainwater tanks and that these should be able to be used. The rule includes a note to that effect, but perhaps it could be made clearer.	Allow	GWRC seeks for the submission point to be allowed.
Survey + Spatial New Zealand (Wellington Branch) 72.28	nzisplanning.wgtn@gmail.com	Oppose	Submitter has requested that THWT-O2 <i>Three Waters Network capacity</i> needs to anticipate the outcome of the development contributions policy.	GWRC opposes this position. This objective is needed regardless of the development contributions policy.	Disallow	GWRC seeks retention of the notified wording of the objective.
Survey + Spatial New Zealand (Wellington Branch) 72.32	nzisplanning.wgtn@gmail.com	Oppose	Submitter has requested that SUB-S4 <i>Water supply</i> be amended to remove requirement for a water metering device to be installed.	GWRC supports provisions to meet SUB-O2 and SUB-P5.	Disallow	Disallow.
Kāinga Ora – Homes and Communities 81.1, 81.7, 81.13, 81.14, 81.15, 81.16, 81.17, 81.18, 81.19	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Oppose	Submitter has requested rezoning of large areas of land within Porirua.	The rezoning has not been adequately assessed to consider effects on the environment, hazards, transport and infrastructure. This level of development, if realised, would not give effect to the NPS-FM, RPS or RMA.	Disallow	Disallow.

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Kāinga Ora – Homes and Communities 81.27	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Oppose	The submitter considers that a definition of the term ‘addition’ is unnecessary and has a plain and ordinary meaning that does not need to be specifically defined.	The term is used in Natural Hazards provisions. The definition specifically relates to an increase in floor area, which is relevant to natural hazards. Any other additions which may be included in the common meaning of the word are not relevant and so need to be excluded from the concept of ‘addition’.	Disallow	GWRC seeks the retention of the definition of the term ‘addition’.
Kāinga Ora – Homes and Communities 81.79	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Support	The submitter has requested “or” is used instead of “and” in the definition of ‘Heritage values’ to align with Policy HH-P1 <i>Identifying historic heritage</i> .	GWRC supports the amendment that ‘or’ should be used instead of ‘and’. Policy 21 of the RPS refers to ‘one or more’ of these criteria/values. GWRC does not support providing additional information in relation to what is meant by surroundings and representativeness. This information is available in Policy 21 of the RPS.	Allow	GWRC seeks that the definition of heritage values is amended as proposed by Kāinga Ora.
Kāinga Ora – Homes and Communities 81.82	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Oppose	The submitter has requested amendments to the definition of hydraulic neutrality.	GWRC opposes the suggested wording. If no development is occurring on a lot then hydraulic neutrality will be achieved without requiring a further device. GWRC considers that the term ‘development area’, as defined by the PDP, is appropriate for use within the definition of hydraulic neutrality.	Disallow	GWRC seeks that the suggested wording be disallowed.
Kāinga Ora – Homes and Communities 81.83	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Support	The submitter has requested an amendment to the defined term “hydraulic neutrality device”, and proposes that the term instead be “hydraulic neutrality <u>method</u> device”.	GWRC supports the amendment in part and seeks that the defined term be ‘hydraulic neutrality device or method’.	Allow	GWRC supports the amendment in part and seeks that the defined term be ‘hydraulic neutrality device or method’.
Kāinga Ora – Homes and Communities 81.85	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Support	Submitter has requested that the definition of “impervious surface” be amended to reflect that not all landscaping is permeable.	GWRC supports the use of the term ‘vegetated’ rather than ‘landscaped’ as gardens can include hard, impermeable landscaped areas. GWRC does not support the addition of ‘porous’, as materials can be porous but not permeable. Paving that is permeable is what is needed to be excluded from the definition of impervious surface.	Allow in part	GWRC supports the requested amendment to the exclusion in clause (b). GWRC opposes the amendment to the exclusion in clause (c).
Kāinga Ora – Homes and Communities 81.101	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Support	Submitter has requested that the definition of “maintenance and repair” be amended to better reflect what is being defined.	GWRC supports the addition of “infrastructure” to the title of the definition.	Allow	GWRC supports the requested change of wording.
Kāinga Ora – Homes and Communities 81.205	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Support	The submitter has requested an amendment to Strategic Objective FC-O4 <i>Compatible activities</i> to delete the words ‘with similar effects and functions’.	GWRC supports this change as it recognises that the development of a vibrant city will require changes to the character and amenity of existing development over time. Policy 8 of the RPS only refers to incompatible activities, not necessarily those with similar effects and functions.	Allow	GWRC supports the amendment proposed.
Kāinga Ora – Homes and Communities 81.218	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Oppose	The submitter has requested a change in the introductory text of REE – Resilience, Efficiency and Energy section, to replace “avoided” with “mitigated”.	GWRC opposes this. The statement is already qualified with ‘where possible’. Managing or mitigating the risks of natural hazards may not be sufficient. Policy 29 of the RPS seeks to avoid inappropriate subdivision and development in areas at high risk from natural hazards.	Disallow	GWRC seeks retention of the wording as notified.

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Kāinga Ora – Homes and Communities 81.362, 81.366, 81.933	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Oppose	Submitter has requested that THWT-P2 <i>Integration with the Three Waters Network</i> and THWT-R3 <i>Water metering device for new buildings connected to reticulated water systems</i> be amended to remove rule framework for water metering devices.	GWRC supports provisions to achieve THWT-O2.	Disallow	Disallow.
Kāinga Ora– Homes and Communities 81.363	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Oppose	Submitter has requested that policy THWT-P3 is amended so that network capacity is ‘guided by’, rather than ‘meets’ the Wellington Water Regional Standard for Water Services, May 2019.	The standard includes water sensitive urban design and other appropriate design and performance criteria. It was developed to consolidate the existing codes of practice for water services for Porirua City, Hutt City, Upper Hutt City and Wellington City in order to provide a regionally consistent method of design and implementation of water services across the Wellington region.	Disallow	GWRC seeks to retain the requirement in THWT-P3 to meet the Wellington Water Regional Standard for Water Services, May 2019.
Kāinga Ora – Homes and Communities 81.367	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Oppose	Submitter has requested that rule THWT-R4 is amended so that permitted activity standard does not include compliance with external technical standards.	This rule includes appropriate design and performance criteria. References to external standards is a regionally consistent approach agreed between PCC, WWL and GWRC.	Disallow	GWRC seeks the retention of the notified wording of THWT-R4.
Kāinga Ora – Homes and Communities 81.368	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Oppose	Submitter has requested that rule THWT-R5 is amended so that permitted activity standard does not include compliance with external technical standards.	This rule includes appropriate design and performance criteria. References to external standards is a regionally consistent approach agreed between PCC, WWL and GWRC.	Disallow	GWRC seeks the retention of the notified wording of THWT-R5.
Kāinga Ora – Homes and Communities 81.370	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Oppose	Submitter has requested that standard THWT-S2 <i>Hydraulic neutrality</i> be deleted.	This standard includes appropriate design and performance criteria. References to external standards is a regionally consistent approach agreed between PCC, WWL and GWRC.	Disallow	GWRC seeks the retention of the notified wording of THWT-S2.
Kāinga Ora – Homes and Communities 81.404, 81.405, 81.406, 81.407, 81.408, 81.409, 81.410, 81.411, 81.412, 81.414, 81.415, 81.416, 81.417, 81.419, 81.421, 81.422, 81.423	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Oppose	Submitter has requested that all natural hazard overlays be removed from the plan objectives, policies and rules and replaced with hazard areas.	The natural hazard layers are underpinned by robust science that clearly identify areas prone to natural hazards that may pose a risk to development. They provide certainty for planners, developers and members of the public using the plan and allow risk based decisions to avoid or mitigate the effects of hazard events that have a large cost on the community.	Disallow	GWRC seeks that all submission points related to the removal of the natural hazard overlays and replacement with natural hazard areas be disallowed and seeks retention of the natural hazard overlays.
Kāinga Ora – Homes and Communities 81.408	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Oppose	Submitter has requested inclusion of mitigation at the end of point 1, in NH-P3 <i>Hazard-Sensitive Activities and Potentially- Hazard-Sensitive Activities within the Medium Hazard Areas</i> .	Inclusion of mitigation is a duplication within the intent of the policy. The policy already includes a directive concerning mitigation measures. The aim of the policy is to avoid increasing the risk with appropriate mitigation measures.	Disallow	GWRC seeks to retain ‘avoided’ rather than include a further mitigation in the list of point 1 of NH-P3.
Kāinga Ora – Homes and Communities 81.409	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Support in part	The submitter has requested that NH-P4 point 1 is amended to read: 1. The activity incorporates mitigation measures that demonstrate that <u>increased</u> risk to people's lives and wellbeing and building damage is avoided <u>mitigated</u> .	GWRC supports the first suggested change as any development in hazard areas involves a measure of risk, the aim is to avoid increasing the risk. GWRC opposes the second suggested change as the policy already includes a directive concerning mitigation measures, and therefore including further mitigation is redundant. The aim of the policy is to avoid increasing the risk with appropriate mitigation measures.	Allow in part	Allow the first suggested change only.

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Kāinga Ora – Homes and Communities 81.423	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Oppose	The submitter has requested a lowering of the activity status of NH-R8 <i>Any Hazard-Sensitive Activity and Potentially-Hazard-Sensitive Activity and associated buildings within the High Hazard Areas in a Natural Hazard Overlay</i> from non-complying to discretionary activity within the City Centre Zone.	GWRC opposes this activity being a discretionary activity instead of a non-complying activity. Non-complying status signals that development of this nature is not expected within High Hazard Areas. It is appropriate that to be granted consent, the activity meets the policies and the effects are no more than minor (s104D).	Disallow	GWRC seeks retention of the non-complying status of this rule within the City Centre Zone.
Kāinga Ora – Homes and Communities 81.431, 81.432, 81.433	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Oppose	The submitter has requested that provisions in the following sections are amended to remove 'avoid' statements: <ul style="list-style-type: none"> • ECO - Ecosystems and Indigenous Biodiversity • NATC - Natural Character • NFL - Natural Features and Landscapes. 	GWRC opposes the amendment of all 'avoid' statements in these provisions. Avoiding adverse effects in certain circumstances is appropriate, and consistent with the higher order documents.	Disallow	GWRC seeks retention of the 'avoid' statements of the notified provisions of these chapters where this is appropriate in terms of the effects mitigation hierarchy and higher order documents.
Kāinga Ora – Homes and Communities 81.444	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Oppose	Submitter has requested that policy SUB-P5 removes reference to meeting the performance criteria of the Wellington Water Regional Standard for Water Services, May 2019.	This standard includes appropriate design and performance criteria. References to external standards is a regionally consistent approach agreed between PCC, WWL and GWRC. This standard was developed to consolidate the existing codes of practice for water services for Porirua City, Hutt City, Upper Hutt City and Wellington City in order to provide a regionally consistent method of design and implementation of water services across the Wellington region.	Disallow	GWRC seeks the retention of the notified wording of SUB-P5 clause 3.
Kāinga Ora – Homes and Communities 81.492	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Oppose	Submitter has requested deletion of matter of discretion point 6 in EW-S1.	Disagree that staging will be fully considered by the total area of exposed soils at any point in time.	Disallow	Disallow.
Kāinga Ora – Homes and Communities 81.493	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Oppose	Submitter has requested that matters of discretion points 5, 6, 7, and 8 are replaced with 'Mitigation landscaping' in EW-S2.	Mitigation landscaping is not an appropriate replacement for the matters in 5, 6, 7 and 8 and is unlikely to appropriately manage adverse effects resulting from the migration of silt, sediment and dust from the site. Retaining sediment onsite is an important standard to include for this activity.	Disallow	Disallow.
Kāinga Ora – Homes and Communities 81.495	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Oppose	Submitter has requested the deletion on standard EW-S4.	Disagree that stabilisation is inherent in standards EW-S1 and EW-S2 as the submitter suggests. The standard serves a useful purpose to ensure that earthworks are stabilised with vegetation or other means to render the site stable within an appropriate timeframe.	Disallow	Disallow.

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Kāinga Ora – Homes and Communities 81.496	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Oppose	Submitter has requested deletion of point 1 of EW-S5, and deletion of the Advice notes.	Retaining sediment onsite is an important standard to include for all zones. The discharge of sediment to sensitive receiving environments such as Porirua Harbour and Pāuatahanui Inlet is an issue that requires further action from both Councils (PCC and GWRC). The advice notes serve an important purpose to remind plan users of other consenting requirements and information that is available about earthworks and sediment mitigation.	Disallow	Disallow.
Kainga Ora – Homes and Communities 81.882	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Support	Submitter has requested that APP8 – <i>Biodiversity offsetting</i> is retained as notified.	We support this appendix as notified.	Allow	Allow.
Kainga Ora – Homes and Communities 81.883	developmentplanning@hnzc.co.nz Copies to: KWilliams@propertygroup.co.nz	Support	Submitter has requested that APP9 – <i>Biodiversity compensation</i> is retained as notified.	We support this appendix as notified.	Allow	Allow.
Waka Kotahi NZ Transport Agency 82.20	Claudia.Jones@nzta.govt.nz Consentsandapprovals@nzta.govt.nz	Support	Submitter has requested changes to the definition of “Planned network upgrade”.	Agree that reference should be made to the “Wellington Regional Land Transport Plan” to ensure consistency with wording throughout the plan. Agree that the Wellington Regional Public Transport Plan should be included in the definition as it sets out planned public transport improvements.	Allow	Allow.
Waka Kotahi NZ Transport Agency 82.21	Claudia.Jones@nzta.govt.nz Consentsandapprovals@nzta.govt.nz	Support	Submitter has requested that the definition of “Regionally significant infrastructure” be retained as notified.	Support this definition which aligns with the definition of Regionally significant infrastructure in the Regional Policy Statement.	Allow	Allow.
Waka Kotahi NZ Transport Agency 82.30	Claudia.Jones@nzta.govt.nz Consentsandapprovals@nzta.govt.nz	Support	Submitter has requested an amendment to Strategic Objective HO-O2 <i>Housing density</i> .	Support more explicit recognition of the need to ensure the transport network has sufficient capacity. Aligns with draft RLTP Objective 2: Transport and land use are well integrated to support compact urban form, liveable places and a strong regional economy.	Allow	Allow.
Waka Kotahi NZ Transport Agency 82.35	Claudia.Jones@nzta.govt.nz Consentsandapprovals@nzta.govt.nz	Support	Submitter has requested amendment to Strategic Objective UFD-O5 Subdivision, use and development to ensure the transport network is safe and connected, and has multi-modal options.	Aligns with draft RLTP 2021 Policy 2.6: Advocate for transport infrastructure in new developments that is designed to enable safe, connected and attractive walking, cycling, micro- mobility and public transport services, and is consistent with relevant best-practice guidance.	Allow	Allow.
Waka Kotahi NZ Transport Agency 82.39	Claudia.Jones@nzta.govt.nz Consentsandapprovals@nzta.govt.nz	Support	Submitter has requested amendment to INF- O4 <i>Transport Network</i> to include connectedness and safety.	Requested amendment aligns with draft RLTP 2021 Objective 5: Journeys to, from and within the Wellington Region are connected, resilient and reliable.	Allow	Allow.
Waka Kotahi NZ Transport Agency 82.83	Claudia.Jones@nzta.govt.nz Consentsandapprovals@nzta.govt.nz	Support	Submitter has requested amendments to <i>INF-Table 1 Road design standards</i> re gradients and cycle lane widths to meet best practice.	Requested amendment aligns with draft RLTP 2021 Policy 2.6 Advocate for transport infrastructure in new developments that is designed to enable safe, connected and attractive walking, cycling, micro-mobility and public transport services, and is consistent with relevant best-practice guidance.	Allow	Allow.

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Waka Kotahi NZ Transport Agency 82.105	Claudia.Jones@nzta.govt.nz Consentsandapprovals@nzta.govt.nz	Support	Submitter has requested amendments to TR-S9 <i>On-site bicycle parking spaces</i> to include proximity of parking to main building access.	Requested amendment aligns with draft RLTP 2021 Policy 2.6 Advocate for transport infrastructure in new developments that is designed to enable safe, connected and attractive walking, cycling, micro-mobility and public transport services, and is consistent with relevant best-practice guidance.	Allow	Allow.
Waka Kotahi NZ Transport Agency 82.108, 82.293	Claudia.Jones@nzta.govt.nz Consentsandapprovals@nzta.govt.nz	Support	Submitter has requested that NH-O1 <i>Risk from natural hazards</i> and NH-O2 <i>Planned mitigation works</i> be amended to include 'infrastructure' as one of the matters that may be subject to risks from natural hazards.	GWRC supports the addition as all infrastructure represents a historic investment. Minimising the risks and hazards faced is prudent and reduces costs, ensuring intergenerational equity.	Allow	GWRC supports the proposed additions.
Waka Kotahi NZ Transport Agency 82.136	Claudia.Jones@nzta.govt.nz Consentsandapprovals@nzta.govt.nz	Support	Submitter has requested amendments to SUB-P4 <i>Functioning of the transport network</i> to improve degree to which multi-modal provision and connectivity is captured in all new subdivisions.	Requested amendment aligns with draft RLTP 2021 Policy 2.6 Advocate for transport infrastructure in new developments that is designed to enable safe, connected and attractive walking, cycling, micro-mobility and public transport services, and is consistent with relevant best-practice guidance.	Allow	Allow.
Waka Kotahi NZ Transport Agency 82.137	Claudia.Jones@nzta.govt.nz Consentsandapprovals@nzta.govt.nz	Support	Submitter has requested amendments to SUB-P7 <i>Subdivision in the Future Urban Zone</i> to include 'safe' in relation to operation of the transport network.	Requested amendment aligns with draft RLTP 2021 Objective 4: People can move around the Wellington Region safely.	Allow	Allow.
Waka Kotahi NZ Transport Agency 82.163	Claudia.Jones@nzta.govt.nz Consentsandapprovals@nzta.govt.nz	Oppose	Submitter has requested an amendment to CE-R12 <i>All hard engineering measures in the High Hazard Area of the Coastal Hazard Overlays</i> to allow road maintenance as a restricted discretionary activity with the only matter of discretion being safety of the transport network. Submitter has requested that a definition for 'Hard Engineering Measures' be included.	Roads in coastal areas will come under increasing pressure from coastal hazards as sea level rises, requiring increasing levels of hard engineered structures to maintain their functioning. This will have ongoing and increasing impacts on the coastal environment and associated ecosystem services and biodiversity. It is appropriate that all these factors are taken into consideration, even for maintenance, which could encompass a broad range of activities.	Disallow	GWRC seeks to retain road maintenance as a discretionary activity or alternatively to add to the list of the matters of discretion to include effects on coastal processes, and natural functioning of the coastal environment and ecosystem. Allow submission point requesting a definition for 'Hard Engineering Measures'.
Powerco Ltd 83.43	planning@powerco.co.nz	Support	Submitter has requested that INF-P21 <i>Upgrades to and new infrastructure in Special Amenity Landscapes</i> be amended to remove requirement to avoid significant adverse effects on Special Amenity Landscapes. Submitter has also requested an amendment that the identified characteristics and values are <u>maintained to the extent practicable</u> .	We support the first amendment as it recognises that new infrastructure may not be able to avoid adverse effects. Policy 28 of the RPS requires district plans to manage Special Amenity Landscape values to maintain or enhance their values, in the context of other activities continuing. We do not support the remaining amendments as it would not be consistent with Policy 28 of the RPS.	Allow in part	GWRC seeks that the first proposed amendment to INF-P21 be allowed.
Powerco Ltd 83.62	planning@powerco.co.nz	Support	Submitter requests that INF-R39 <i>Upgrading of infrastructure, excluding roads and walkways, cycleways and shared paths, located in an area identified in SCHED7 – Significant Natural Areas</i> be amended so that upgrades that have no or very little potential impact on Significant Natural Areas are permitted.	Agree that where upgrades have no or minor effects they should be permitted.	Allow	Allow.

Submitter Name/ Submission Number	Submitter Address/Email	Support or Oppose	The particular parts of the submission I support or oppose are:	The reasons for my support or opposition are:	Allow or disallow	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
Titahi Bay Community Group and Pestfree Titahi Bay 94.5, 94.11	Superdeboer13@gmail.com	Support	Submitter has requested that the entire Whitireia Park be protected as an SNA.	We agree with the suggestion to expand the area covered by SNAs in Whitireia Park. This should include all areas recognised as Key Native Ecosystems in the Park.	Allow	GWRC seeks that the submission point is allowed to the extent that areas that meet the criteria within RPS Policy 23 are identified as SNAs within SCHED7.
Titahi Bay Residents Association Incorporated 95.1	TBRA@slingshot.co.nz	Oppose	Submitter has requested that a new definition for mean-high-water-springs (MHWS) is added.	Defining mean high water springs as a fixed line does not allow for changes (in mean high water springs) that may occur over the lifespan of the plan; for example as a result of sea level rise.	Disallow	GWRC seeks that mean high water springs is defined, but considers that the definition as proposed is not suitable.
Radio New Zealand Limited 121.11	ben.williams@chapmantripp.com lucy.forrester@chapmantripp.com	Oppose	Submitter requests an amendment to the definition of “reverse sensitivity” to ensure that it fully describes what reverse sensitivity actually is.	The definition used in the District Plan is consistent with the definition in the RPS.	Disallow	GWRC seeks that the definition of “reverse sensitivity” is retained as notified.
Radio New Zealand Limited 121.20	ben.williams@chapmantripp.com lucy.forrester@chapmantripp.com	Oppose	Submitter requests that INF-P5 <i>Adverse effects on Regionally Significant Infrastructure</i> goes further to protect regionally significant infrastructure from inappropriate subdivision and land use.	GWRC considers that the term ‘minimise’ is more appropriate than ‘avoid’ reverse sensitivity effects in this context.	Disallow	GWRC seeks that INF-P5 is retained as notified.
Director-General of Conservation 126.12	Tchristie@doc.govt.nz	Support	Submitter has requested that the policy for vegetation removal be limited to the circumstances outlined in ECO-P3.	Agree that limiting the policy to the specified activities is appropriate.	Allow	Allow.
Director-General of Conservation 126.13	Tchristie@doc.govt.nz	Support	Submitter has requested that policy ECO-P4 <i>Other subdivision, use and development in Significant Natural Areas</i> be deleted, or clarify that it is a restriction on development and clarify its relationship with ECO-P2.	We agree that clarity is needed on how this policy interacts with, and adds to, the direction already provided by ECO-P2.	Allow	Allow the part of the submission seeking to clarify its relationship with ECO-P2.
Director-General of Conservation 126.21	Tchristie@doc.govt.nz	Support	Submitter seeks that ECO-R4 Earthworks within a Significant Natural Area be amended to be consistent with the requirements of the NES-FM.	We agree that the rule should be amended to be consistent with the requirements of the NES-FM.	Allow	Allow.
Director-General of Conservation 126.23	Tchristie@doc.govt.nz	Support	Submitter seeks that the activity status for ECO-R7 <i>Removal of indigenous vegetation within Significant Natural Areas</i> be changed from Restricted Discretionary to Discretionary.	We agree that the activity status of this rule should be discretionary to discourage unnecessary indigenous vegetation removal.	Allow	Allow.
Director-General of Conservation 126.47	Tchristie@doc.govt.nz	Support	Submitter has requested new provisions to provide policy direction to avoid adverse effects on areas of outstanding natural character in the coastal environment.	The District Plan must give effect to Policy 13(1)(a) of the NZCPS.	Allow	Allow.
Plimmerton Developments Limited 149.1, 149.2, 149.3, 149.4	brendan.hogan@gillesgroup.co.nz	Support	Submitter has requested that the area subject to Plan Change 18 to the Operative Porirua District Plan be zoned to Plimmerton Farm – Special Purpose Zone, and the provisions within Plan Change 18 be included as a chapter within the Proposed District Plan.	GWRC supports including the area subject to Plan Change 18 within the Proposed District Plan as described. The provisions have already been subject to a Streamlined Planning Process and the Minister has made a decision on the provisions.	Allow	GWRC seeks for the area subject to Plan Change 18 to the Operative Porirua District Plan to be zoned to Plimmerton Farm – Special Purpose Zone, and all provisions from Plan Change 18 to be incorporated into the Proposed District Plan.
Silverwood Corporation Limited 172.1 – 172.5	sblick@egmontdixon.com	Oppose	The submitter has requested that the site is zoned Future Urban Zone.	The District Plan must give effect to the National Policy Statement for Freshwater Management 2020 (NPS-FM). Additional areas of greenfield development will add to the contaminant load entering the environment. The NPS-FM requires that urban development maintains or improves water quality.	Disallow	Disallow.

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Judgeford Heights Ltd 200.1	cmtransportltd@outlook.com	Oppose	The submitter has requested that the site is zoned Future Urban Zone.	The District Plan must give effect to the National Policy Statement for Freshwater Management 2020 (NPS-FM). Additional areas of greenfield development will add to the contaminant load entering the environment. The NPS-FM requires that urban development maintains or improves water quality.	Disallow	Disallow.
Trustees of the Ken Gray No. 1 Family Trust & Ken Gray No. 2 Family Trust 211.4	andrew.stewart@morrisonkent.com	Oppose	Submitter has requested that the “Coastal Hazard – Current Inundation” and “Coastal Hazard – Future Inundation” overlays be removed from their property.	The coastal hazard inundation overlays are based on robust science and evidence.	Disallow	GWRC seeks that the “Coastal Hazard – Current Inundation” and “Coastal Hazard – Future Inundation” overlays are retained as notified.
Trustees of the Ken Gray No. 1 Family Trust & Ken Gray No. 2 Family Trust 211.5	andrew.stewart@morrisonkent.com	Oppose	Submitter has requested that the “Tsunami Hazard Overlay (1:100yr, 1:500yr and 1:1000yr) Inundation Extent” overlay be removed from their property.	The tsunami hazard overlay is based on robust science and evidence.	Disallow	GWRC seeks that the “Tsunami Hazard Overlay (1:100yr, 1:500yr and 1:1000yr) Inundation Extent” overlay is retained as notified.
Queen Elizabeth the Second National Trust (QEII) 216.4	mlucas@qeii.org.nz	Support.	Submitter has requested a new definition for vegetation removal.	We agree that a definition of vegetation removal would ensure that all relevant activities are covered.	Allow	Allow.
Queen Elizabeth the Second National Trust (QEII) 216.17	mlucas@qeii.org.nz	Oppose.	Submitter has requested removal of objective ECO-O2 <i>Plantation Forestry</i> .	We disagree that ECO-O2 should be removed, as it provides the policy framework for the district plan to be more stringent than the National Environmental Standards for Plantation Forestry.	Disallow	Disallow.
Queen Elizabeth the Second National Trust (QEII) 216.23	mlucas@qeii.org.nz	Oppose	Submitter has requested that policy ECO-P6 <i>Development of existing vacant lots</i> be deleted.	We agree that clarity is needed on how this policy interacts with, and adds to, the direction already provided by ECO-P2.	Allow	Allow for more specific provisions to clarify relationship with ECO-P2.
Queen Elizabeth the Second National Trust (QEII) 216.26	mlucas@qeii.org.nz	Support.	Submitter has requested amendments to policy ECO-P9 <i>Existing plantation forestry</i> .	We agree that this policy could be clearer as to its intentions, however we consider that the proposed drafted could be too restrictive.	Allow	Allow for some changes to ECO-P9 to be made.
Royal Forest and Bird Protection Society 225.54	a.geary@forestandbird.org.nz	Oppose	Submitter has requested changes to the definition of ‘Biodiversity offset’.	Offsetting does not always have to entail a like- for-like exchange. A trading-up exchange can also be considered a form of biodiversity offset. ECO-P2 explicitly links the use of biodiversity offsetting to the principles listed in APP8.	Disallow	Disallow.
Royal Forest and Bird Protection Society 225.58	a.geary@forestandbird.org.nz	Support	Submitter has requested that the definition of ‘Conservation activity’ be deleted.	There is the potential for confusion over what the parameters of ‘conservation activity’ may include.	Allow	Allow.
Royal Forest and Bird Protection Society 225.73	a.geary@forestandbird.org.nz	Support	Submitter has requested amendments to the definition of ‘Significant Natural Area’ to ensure that it is not limited to areas that have been spatially identified and mapped at the time the District Plan is made.	It is possible that the scheduled areas do not cover all significant biodiversity values in the district. Areas not yet identified must also be subject to the Plan provisions.	Allow	Allow.
Royal Forest and Bird Protection Society 225.107	a.geary@forestandbird.org.nz	Oppose	Submitter has requested that INF-P1 <i>The benefits of Regionally Significant Infrastructure</i> be amended to remove reference to environmental benefits of regionally significant infrastructure.	GWRC does not agree that regionally significant infrastructure does not have environmental benefits. Without effective efficient and managed (wastewater, waste management especially) infrastructure systems there risks to the environment are significant.	Disallow	GWRC seeks to retain the inclusion of environmental benefits in the Infrastructure Policy provisions.

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Royal Forest and Bird Protection Society 225.113	a.geary@forestandbird.org.nz	Support	Submitter has requested that INF-P8 <i>Provide for Regionally Significant Infrastructure and other infrastructure outside of Overlays</i> be amended to take account of SNAs that are not currently identified.	GWRC supports some of the alternative wording proposed, but does not consider that INF-P8 should be deleted.	Allow	GWRC seeks to retain the inclusion of INF-P8 with amendments to take into account SNAs that have not yet been identified.
Royal Forest and Bird Protection Society 225.148	a.geary@forestandbird.org.nz	Support	Submitter has requested a new ECO objective that provides for maintaining indigenous biodiversity.	We agree that Council has a function to maintain indigenous biodiversity which extends beyond SNAs.	Allow	Allow for provisions to give effect to Council's function to maintain indigenous biodiversity.
Royal Forest and Bird Protection Society 225.150	a.geary@forestandbird.org.nz	Support	Submitter has requested amendments to ECO-P1 to provide for additional SNAs to be identified by applying the RPS Policy 23 criteria.	It is possible that the scheduled areas do not cover all significant biodiversity values in the district. Areas not yet identified must also be subject to the Plan provisions.	Allow	Allow.
Royal Forest and Bird Protection Society 225.151	a.geary@forestandbird.org.nz	Oppose	Submitter has requested ECO-P2 be amended to remove reference to biodiversity compensation.	We do not support the removal of compensation from the effects management hierarchy. RMA s104 provides for the consideration of environmental compensation in consenting decisions. While this is the least favoured effects management step, it is preferable for it be explicitly acknowledged and its use directed by principles (which are provided in APP9).	Disallow	Disallow.
Royal Forest and Bird Protection Society 225.159	a.geary@forestandbird.org.nz	Support	Submitter has requested to delete ECO-P7 Protection and restoration initiatives and replace it with a suite of more specific policies.	We agree that it may be beneficial for at least this policy to provide more specificity around how protection and restoration initiatives will be encouraged.	Allow	Allow for more specific provisions about how protection and restoration initiatives will be encouraged.
Royal Forest and Bird Protection Society 225.160	a.geary@forestandbird.org.nz	Support in part.	Submitter has requested that ECO-P8 New plantation forestry be amended to be more stringent than the National Environmental Standards for Plantation Forestry in relation to SNAs. Submitter has requested that ECO-P8 apply to existing plantation forestry.	We agree that further direction could be provided to reduce the adverse effects of new or existing plantation forestry on indigenous biodiversity.	Allow	Allow.
Royal Forest and Bird Protection Society 225.164	a.geary@forestandbird.org.nz	Oppose	Submitter has requested that ECO-P12 Significant Natural Areas within the coastal environment be deleted, and amendments are made to ECO-P2 to give effect to Policy 11 of the NZCPS.	We agree that the ECO-P12 does not give effect to NZCPS Policy 11(b) as drafted. However, we consider that ECO-P12 should be amended rather than deleted.	Allow	Allow to the extent that the PDP must give effect to Policy 11(b) of the NZCPS.
Royal Forest and Bird Protection Society 225.169	a.geary@forestandbird.org.nz	Support	Submitter has requested that ECO-R3 Restoration and maintenance of a Significant Natural Area should be amended to ensure it applies to SNAs not identified on overlays.	We agree that the rule should be applied to all SNAs. We do not agree with removing ECO-P2 and ECO-P4 from the matters of discretion.	Allow	Disallow part of submission that removes references to ECO-P2 and ECO-P4.
Royal Forest and Bird Protection Society 225.174	a.geary@forestandbird.org.nz	Support	Submitter has requested that ECO-R8 <i>New plantation forestry within a Significant Natural Area</i> be amended to require a setback from SNAs and wetlands to provide adequate protection.	We support requiring a setback for new plantation forestry from SNAs and wetlands.	Allow	Allow.
Royal Forest and Bird Protection Society 225.193	a.geary@forestandbird.org.nz	Oppose	Submitter has requested that CE-P6 <i>Subdivision within the coastal environment</i> be deleted. Submitter seeks clear policy direction that subdivision is not appropriate in the coastal environment.	GWRC supports the risk-based approach to hazard identification and the rules that support this. Within this framework there may be suitable sites for subdivision within the coastal environment and therefore the provisions should be retained. The policy framework is suitably restrictive to allow consideration of the range of values within the coastal environment.	Disallow	GWRC seeks retention of CE-P6 and the policy framework in the Plan to determine appropriate development.

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Royal Forest and Bird Protection Society 225.194	a.geary@forestandbird.org.nz	Support	Submitter has requested that CE-P7 <i>Mining and quarrying activities within the coastal environment</i> be amended to exclude new mining and quarrying activities in SCHED7 SNA, ONFLs and HNC overlays.	GWRC agrees that new mining and quarrying activities within SNAs, ONFLs and HNC areas is unlikely to be appropriate.	Allow	Allow.
Royal Forest and Bird Protection Society 225.247	a.geary@forestandbird.org.nz	Support	Submitter requests that an additional note is inserted at the top of ECO SCHED7 to explain that other areas not listed in the schedule but meeting the criteria in RPS Policy 23 are also considered SNAs.	We agree that areas meeting the criteria in RPS Policy 23 that are not in SCHED7 should also be treated as SNAs.	Allow	Allow.
Royal Forest and Bird Protection Society 225.255	a.geary@forestandbird.org.nz	Support	Submitter has requested a new provision that would provide policy direction to give effect to NZCPS Policy 14 Restoration of natural character.	The District Plan must give effect to Policy 14 of the NZCPS, to ensure restoration or rehabilitation of the natural character of the coastal environment is promoted.	Allow	Allow.
Reidy Graham and Janet 234.2	bryce@landmatters.nz	Oppose	Submitter has requested that Rural Lifestyle Zone rules permit a minimum lot size of 1ha, with an average lot size of 2ha.	GWRC does not agree that changes to the minimum lot sizes in the Rural Lifestyle Zone are appropriate. This change will create significant density which could have environmental, transport and infrastructure impacts.	Disallow	Disallow.
Reidy Graham and Janet 234.5	bryce@landmatters.nz	Oppose	Submitter has requested that the Natural Hazards overlays be removed from their property.	The natural hazard layers are underpinned by robust science that clearly identify areas prone to natural hazards that may pose a risk to development. They provide certainty for planners, developers and members of the public using the plan and allow risk based decisions to avoid or mitigate the effects of hazard events that have a large cost on the community.	Disallow	GWRC seeks that all submission points related to the removal of the natural hazard overlays and replacement with natural hazard areas be disallowed and seeks retention of the natural hazard overlays and provisions.
Reidy Graham and Janet 234.7	bryce@landmatters.nz	Oppose	Submitter has requested changes to NH-P2 <i>Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities within the High Hazard Areas</i> to delete 'avoid' and replace with 'discourage'. Submitter has also requested mitigation to be included in the list of point 2.	Discouraging development in high hazard areas is not strong enough to prevent inappropriate development. The risk-based framework for the natural hazard provisions need to include avoidance for development that could face intolerable risk and be regarded as inappropriate for the location. This type of development may place an unnecessary burden on the community at a later date and therefore should be avoided. Inclusion of mitigation is a duplication within the intent of the policy. The policy already includes a directive concerning mitigation measures. The aim of the policy is to avoid increasing the risk with appropriate mitigation measures.	Disallow	GWRC seeks to retain 'avoid' in NH-P2 and not include a further mitigation in the list of point 2.
The Neil Group and Gray Family 241.1 – 241.3, 241.28	bryce@landmatters.nz	Oppose	The submitter has requested that the site is rezoned from Future Urban Zone to General Residential Zone.	The District Plan must give effect to the National Policy Statement for Freshwater Management 2020. Additional areas of greenfield development will add to the contaminant load entering the environment. The NPS-FM requires that urban development maintains or improves water quality. It is appropriate that a full assessment is made on all Future Urban Zones before they are rezoned to ensure the NPS-FM is given effect to. The Future Urban Zone is supported.	Disallow	Disallow.

Submitter Name/ Submission Number	Submitter Address/Email	Support or Oppose	The particular parts of the submission I support or oppose are:	The reasons for my support or opposition are:	Allow or disallow	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
The Neil Group and Gray Family 241.6, 241.16, 241.17, 241.18	bryce@landmatters.nz	Oppose	The submitter has requested that FUZ-P1, SUB-O4, SUB-P5 and SUB-P7 be amended to provide for a more flexible approach to subdivision and development in the Future Urban Zone.	The Future Urban Zone is established to signal future development. Development should not occur prior to rezoning – this will result in development creep. Enabling development to occur in a piecemeal way would be contrary to the purpose of the zoning – that development is coordinated.	Disallow	Disallow.
The Neil Group and Gray Family 241.27	bryce@landmatters.nz	Oppose	The submitter has requested changes to APP11 – Future Urban Zone Structure Plan Guidance.	We consider that the changes suggested introduce ambiguity about what is required for a Structure Plan.	Disallow	Disallow.
Pukerua Property Group 242.2	bryce@landmatters.nz	Oppose	The submitter has requested that the site is rezoned from Future Urban Zone to General Residential Zone.	The District Plan must give effect to the National Policy Statement for Freshwater Management 2020. Additional areas of greenfield development will add to the contaminant load entering the environment. The NPS-FM requires that urban development maintains or improves water quality. It is appropriate that a full assessment is made on all Future Urban Zones before they are rezoned to ensure the NPS-FM is given effect to. The Future Urban Zone is supported.	Disallow	Disallow.
Titahi Bay Surfriders 244.1	wairakapoint@gmail.com	Support	Submitter has requested that the objective NE-O3 is amended so that the scope extends beyond the harbour.	GWRC supports amending Objective NE-O3 to clarify that the scope extends beyond the harbour into the coastal environment.	Allow	Allow.
Titahi Bay Surfriders 244.2	wairakapoint@gmail.com	Support	Submitter has requested that the objective NE-O4 is amended so that the scope extends beyond the harbour.	GWRC supports amending Objective NE-O4 to clarify that the scope of this objective extends into the coastal environment.	Allow	Allow.
Dale Linda 247.6	Linda.and.milo@gmail.com	Oppose	The submitter has requested to delete CE- P12 <i>Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities in the Low Hazard Areas within the Coastal Hazard Overlays</i> on the basis it is too restrictive and requires total avoidance of all risk.	The policy provides an appropriate pathway for consenting and is an enabling policy.	Disallow	GWRC seeks to retain CE-P12.
Dale Linda 247.11	Linda.and.milo@gmail.com	Oppose	Submitter has requested changes to CE-R9 <i>Hazard-Sensitive Activities within the Low Hazard area of the Coastal Hazard Overlays</i> on the basis it is too restrictive and discourages development.	The rule provides an appropriate pathway for consenting and is an enabling policy to reduce risk. It is appropriate that buildings within the low hazard areas are built with flood levels above the 1000yr tsunami flow depths. This will also provide protection from other coastal flooding hazards such as storm tide.	Disallow	GWRC seeks to retain CE-R9 in its current form.
Te Rūnanga o Toa Rangatira 264.63, 264.82	resourcemanagement@ngatitoea.iwi.nz	Oppose	Submitter has requested that areas of Titahi Bay and Elsdon are zoned as Medium Density Residential rather than General Residential Zone.	The rezoning has not been adequately assessed to consider effects on the environment, hazards, transport and infrastructure.	Disallow	Disallow.
Te Rūnanga o Toa Rangatira 264.97	resourcemanagement@ngatitoea.iwi.nz	Support	Submitter has requested NE-O1 be amended to seek to enhance and improve the natural character, landscapes, features and ecosystems in Porirua.	GWRC supports the amendments suggested, as the District Plan will be seeking to enhance and improve as well as recognise and protect.	Allow	GWRC seeks that NE-O1 is amended as suggested.
Te Rūnanga o Toa Rangatira 264.98	resourcemanagement@ngatitoea.iwi.nz	Support	Submitter has requested NE-O2 be amended to seek to enhance and improve areas with natural, ecological and landscape values.	GWRC supports the amendments suggested, as the District Plan will be seeking to enhance and improve as well as recognise and protect.	Allow	GWRC seeks that NE-O2 is amended as suggested.

Submitter Name/ Submission Number	Submitter Address/Email	Support or Oppose	The particular parts of the submission I support or oppose are:	The reasons for my support or opposition are:	Allow or disallow	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
Te Rūnanga o Toa Rangatira 264.99	resourcemanagement@ngatitoea.iwi.nz	Support	Submitter has requested NE-O4 be amended to seek to enhance and improve the health and wellbeing of Te Awarua-o-Porirua Harbour.	GWRC supports the amendments suggested, as the District Plan will be seeking to enhance and improve as well as recognise and protect.	Allow	GWRC seeks that NE-O4 is amended as suggested.