

**Wellington City Proposed District Plan
Report 5C
Three Waters
Subdivision
Earthworks**

**Appendix 2A
Recommended Responses to
Submissions and Further Submissions
Three Waters**

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Aro Valley Community Council	87.29	Energy Infrastructure and Transport / Three Waters / General THW	Not specified	Considers that there are constraints to building in Te Aro that the PDP fails to recognise, including: - The Council's GNZ SLIDE geomorphology map indicates expensive foundations would be required to support development higher than 3 storeys. - The groundwater levels on either side of the street are high and require expensive foundations. - The existing three waters infrastructure will not support large increases in population in Aro Valley.	Not specified.	Reject	No
Generation Zero	FS54.33	Part 2 / Energy Infrastructure and Transport / Three Waters / General THW	Oppose	For character areas, the central test is "other" qualifying matter under clause 3.33(3) of the NPS-UD, alongside the objectives and purpose of the NPS-UD. There is an extremely high bar to creating a character area. The reduction in development capacity must be justified against the national significance of urban development and the objectives of the NPS-UD. Cities are dynamic and changeable. Indeed Wellington underwent many built changes before the currently form was locked in place by modern zoning documents. New housing and residents are a positive to encourage, rather a negative to push out further or crowd into the remaining housing stock. It is significantly more climate friendly to allow denser housing in inner-suburbs, rather than displacing development into greenfields, even accounting for embodied carbon. Character areas are in inner-city suburbs which are highly connected to amenities and already have high-mode share of low emissions transport. This land is often the most resilient. More residents can be easily absorbed in these suburbs and will create a positive impact on that suburb. The counterfactual – the status quo – is that the best quality land in the city is locked away by wealthy residents who seek to preserve an unsustainable way of life and/or their property values. This causes reduced supply and higher prices, higher rents, lower quality, displacement of low-income residents, and pushes residents to worse locations with higher lifetime emissions. The development capacity lost through character areas is extremely weighty; only very 'character' of very high quality can be justified. It must also be a site-specific analysis; the current broadbrush suburb-by-suburb analysis in the current District Plan is not allowed. The approaches advocated by the submitters is erroneous under the NPS-UD and should be rejected. Submitters cannot point to individual streets or houses they subjectively find as 'character' as this does not meet the stringent evidential requirement of clause 3.33(3). Submitters cannot request to go back to the current District Plan character areas, as these are untenable under the new NPS-UD test. Submitters cannot point to the Boffa Miskell report and adopt its recommendation. The report was written before the enactment of the NPS-UD. And, crucially, this approach begs the question of how the report fits into the NPS-UD test in clause 3.33(3). The approach in the PDP, where only contiguous and coherent pockets of high-quality character are proposed, is legal under the NPS-UD.	Disallow / Disallow the submission in full to the extent that this relates to character areas or reducing the amount of enabled housing. Reject increasing character areas in the PDP.	Accept	No
Hugh Good	90.2	Energy Infrastructure and Transport / Three Waters / General THW	Not specified	Considers that 3-waters infrastructure should not be a qualifying matter that governs where development takes place.	Seeks that three waters infrastructure should not be a qualifying matter that governs where development takes place.	Addressed in hearings 1 and was rejected	No
Janice Young	140.5	Energy Infrastructure and Transport / Three Waters / General THW	Not specified	Considers that 3-waters infrastructure should be a qualifying matter that governs where development takes place.	Seeks that 3-waters infrastructure is a qualifying matter that governs where development takes place.	Addressed in hearings 1 and was rejected	No
David Stevens	151.7	Energy Infrastructure and Transport / Three Waters / General THW	Not specified	Considers that the state of Three Waters infrastructure throughout the Broadmeadows to Crofton Downs corridor is inadequate to meet any significant or concentrated housing growth.	Not specified.	Reject	No
Trelissick Park Group	168.3	Energy Infrastructure and Transport / Three Waters / General THW	Support	Supports that THW (Three Waters) covers stormwater hydraulic neutrality and water sensitive design.	Retain the Three Waters chapter, with amendments.	Accept	No
Wellington City Youth Council	201.22	Energy Infrastructure and Transport / Three Waters / General THW	Support	Supports Council's actions for water management under the proposed District Plan	Retain the Three Waters chapter as notified.	Accept	No
Wellington City Youth Council	201.23	Energy Infrastructure and Transport / Three Waters / General THW	Amend	Considers the importance of te mana o te wai to be upheld as it is clear that the current system is failing. Supports a strengthened focus on upholding the rights of mana whenua in relation to water.	Seeks that the PDP is amended to strengthen the focus on upholding the rights of mana whenua in relation to water.	Accept in part	No
Wellington City Council Environmental Reference Group	FS112.1	Part 2 / Energy Infrastructure and Transport / Three Waters / General THW	Support	WCCERG agree with the need for a strengthened focus on upholding the rights of mana whenua in relation to water.	Allow	Accept	No
Te Rūnanga o Toa Rangatira	FS138.19	Part 2 / Energy Infrastructure and Transport / Three Waters / General THW	Support	The submitter seeks that the PDP is amended to strengthen the focus on upholding the rights of mana whenua in relation to water. Te Rūnanga o Toa Rangatira support this submission because the rights of mana whenua in relation to wai is a matter of national importance. Alongside this Te Mana o Te Wai should be upheld.	Allow	Accept	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Wellington City Youth Council	201.24	Energy Infrastructure and Transport / Three Waters / General THW	Not specified	Supports hydraulic neutrality and considers that it should inform future-proof water management approach.	Not specified.	Accept	No
Wellington City Youth Council	201.25	Energy Infrastructure and Transport / Three Waters / General THW	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks that council considers how it can better manage and use greywater to avoid inefficient use of our limited clean water resources.	Reject	No
Tyers Stream Group	221.7	Energy Infrastructure and Transport / Three Waters / General THW	Amend	Considers that existing three waters infrastructure in the area has suffered from lack of maintenance and renewals, and shows signs of significant failure, causing adverse environmental effects. [Refer to original submission for full reason]	Seeks that all building developments, including infill housing, mandate at least neutral or lesser stormwater runoff, compared with pre-development.	Accept in part	No
Tyers Stream Group	221.8	Energy Infrastructure and Transport / Three Waters / General THW	Amend	Considers that pipes can block, causing up and downstream flooding. There is an ongoing cost to keep pipe entrances clear. Pipes remove instream habitat and can impede fish passage, reducing access to suitable habitat. Pipes destroy the natural character of riparian margins. Piping separates people from the streams running through their neighbourhoods, and increases the likelihood of people not knowing about or respecting their waterways.	Seeks addition of piping of waterways other than short sections for access roads and tracks to be non-complying.	Reject	No
Wellington City Council	266.58	Energy Infrastructure and Transport / Three Waters / General THW	Amend	Considers amendments required to wording to align with the NPS-FM.	Amend the Three Waters introduction as follows: (...) Te Mana o te Wai is a <u>hierarchical framework</u> that means that the health and wellbeing of water <u>bodies and freshwater ecosystems</u> must be prioritized <u>first</u> , followed by the health needs of people and then the ability for people and communities to provide for their social, economic and cultural well-being <u>now and in the future</u> . The Three Waters chapter in the District Plan has a role to play by promoting positive effects and avoiding, remedying or mitigating adverse effects of urban development on water in relation to three waters infrastructure, by including objectives, policies and rules which help to achieve these outcomes and <u>contribute towards giving effect to</u> Te Mana o te Wai. The projected increase in urban development in the city will put additional pressure on the existing stormwater network due to increased runoff, with this likely to be further exacerbated by future climate change-induced flooding events. To address this, all new subdivision and development will need to demonstrate that the discharge quantity, and flow rate of associated stormwater runoff generated is no greater than the peak runoff and volumes discharged from the site in an undeveloped state. New development will also need to include water sensitive design methods so that development contributes to promoting positive effects and avoids, remedies or mitigates adverse effects on the health and well-being of water. Degradation of water quality in urban freshwater ecosystems can occur when stormwater runoff from impervious surfaces is channelled directly into streams and rivers. The 'first flush' of stormwater during a rain event can include higher levels of contaminants. New development using copper or zinc building materials (two common contaminants) will need to treat these surfaces or the stormwater from these surfaces to avoid copper or zinc from entering stormwater. New development will also need to include water sensitive design methods so that development contributes to promotes positive effects and avoids, remedies or mitigates adverse effects on the health and well-being of water <u>bodies, freshwater ecosystems and receiving environments</u> . The adoption of stormwater capture and retention and water sensitive design techniques will assist in managing the environmental effects of the 'first flush' of stormwater as well as peak flows and volumes.	Accept	Yes

Onslow Residents Community Association	283.7	Energy Infrastructure and Transport / Three Waters / General THW	Amend	Considers that the report on the readiness of the 3-waters infrastructure in our district for development ("Three Waters Assessment – Growth Catchments Mahi Table and Cost Estimates", Wellington Water, March 2021) shows that it is either already low-pressure (water supply), under-capacity (waste water), or unknown (storm water), so does not support the development enabled by the Proposed District Plan. [Refer to original submission for full reason]	Seeks that the state of the 3-waters infrastructure in Khandallah is considered a qualifying matter.	Addressed in hearings 1 and was rejected	No
Tawa Community Board	294.7	Energy Infrastructure and Transport / Three Waters / General THW	Not specified	Considers that the PDP should provide significant encouragement for new developments to include greywater reuse as a means to future-proof the city against water supply issues. Considers that given the time it will take to fix our water infrastructure and the likelihood of extreme weather leading to increased drought events.	Seeks that the Proposed District Plan provides strong enough direction and encouragement to developers on this issue.	Reject	No
Wellington City Council Environmental Reference Group	FS112.2	Part 2 / Energy Infrastructure and Transport / Three Waters / General THW	Support	WCCERG agree that the PDP should provide significant encouragement for new developments to include greywater reuse where practical.	Allow	Reject	No
Richard Murcott	322.14	Energy Infrastructure and Transport / Three Waters / General THW	Not specified	Considers that population intensification in Thorndon should be throttled back until 3 waters infrastructure investment has been committed. [Refer to original submission for full reason]	Seeks that population intensification in Thorndon be throttled back until infrastructure investment has been committed.	Reject	No
Thorndon Residents' Association Inc	FS69.48	Part 2 / Energy Infrastructure and Transport / Three Waters / General THW	Support	[Refer to Full Submission for reasons and examples of residential character of the Hobson precinct of Thorndon].	Allow	Reject	No
The Sustainability Society	339.2	Energy Infrastructure and Transport / Three Waters / General THW	Amend	Considers that the Three Water chapter should be clarified to avoid confusion and ensure robust retention of stormwater can be achieved when mentioning peak runoff flowrates and overall stormwater volumes.	Amend the 'Three Waters' chapter Introduction as follows: ... "To address this, all new subdivision and development will need to demonstrate that the discharge quantity (volume), and flow rate of associated stormwater runoff generated is no greater than the pre developed volume and peak runoff flowrate and volumes discharged from the site in an undeveloped state." ...	Accept in part	Yes
Wellington City Council Environmental Reference Group	FS112.3	Part 2 / Energy Infrastructure and Transport / Three Waters / General THW	Support	Support the addition / clarification suggested, and making clear what should be achieved/measured.	Allow	Accept in part	Yes
Restaurant Brands Limited	349.8	Energy Infrastructure and Transport / Three Waters / General THW	Support	Support	Retain THW – Te Tūāhanga o Ngā Wai e Toru – Three Waters as notified.	Accept	No
Greater Wellington Regional Council	351.71	Energy Infrastructure and Transport / Three Waters / General THW	Support	Supports the direction of the three waters chapter to protect and enhance the health and well-being of freshwater bodies, and recognise this is an important step for WCC to give effect to the NPS-FM, the Te Whanganui-a-Tara Whaitua Implementation Programme, Te Mahere Wai, Te Awarua-o-Porirua Whaitua and the Ngāti Toa statement. We recognise the significant work undertaken between the draft District Plan and notification to incorporate water sensitive urban design provisions. This is an important aspect of having regard to Policy FW.3 in the Proposed RPS Change 1	Retain the Three Waters chapter as notified with amendments.	Accept in part	No
Greater Wellington Regional Council	351.72	Energy Infrastructure and Transport / Three Waters / General THW	Amend	Considers that the proposed RPS Change 1 contains a new definition for hydrological controls which set out the requirements for managing stormwater run-off flows or volumes in relation to a site's undeveloped state, and this is referenced in Policies FW.3 and 42. The proposed hydraulic neutrality provisions should have regard to this approach.	Seeks to amend the PDP hydraulic neutrality provisions to have regard to Proposed RPS Change 1 in relation to hydrological controls and how they have been defined.	Accept in part	No
Wellington City Council Environmental Reference Group	FS112.4	Part 2 / Energy Infrastructure and Transport / Three Waters / General THW	Support	Support the proposal from GWRC that hydraulic neutrality provisions have regard to proposed RPS Change 1. It is important there is consistency between city and region.	Allow	Accept in part	No
Greater Wellington Regional Council	351.73	Energy Infrastructure and Transport / Three Waters / General THW	Amend	Considers it would also make more sense to have permeable surface provisions in the Three Waters chapter.	Seeks for Wellington City Council to consider whether permeable surface requirements could be included in this chapter.	Accept	Yes
Greater Wellington Regional Council	351.74	Energy Infrastructure and Transport / Three Waters / General THW	Amend	Considers that for permeable surfaces is currently only in the residential zones where the MDRS apply, and therefore does not apply to properties where there are more than four units.	Seeks for WCC to consider whether permeable surface requirements for more than four units could be included in this chapter.	Accept	Yes
Wellington City Council Environmental Reference Group	FS112.5	Part 2 / Energy Infrastructure and Transport / Three Waters / General THW	Support	Support the proposal from GWRC that permeable surface provisions should apply to more than just residential zones where MDRS applies. Agree permeable surface provisions should apply to properties where there are more than four units.	Allow	Accept	Yes
Greater Wellington Regional Council	351.75	Energy Infrastructure and Transport / Three Waters / General THW	Amend	Considers the three waters infrastructure standards in the subdivision chapter to have discrepancies from the standards in the Three Water chapter	Seeks to ensure that the Three Waters rules and standards fully align with the rules and standards in the Subdivision chapter.	Accept	No

Jane Szentivanyi and Ben Briggs	369.9	Energy Infrastructure and Transport / Three Waters / General THW	Amend	Considers that Wellington needs a robust storm water and sewerage regime. The city is facing a climate and ecological emergency illustrated by the weather events that have occurred over the last 12 or so months, causing natural hazards such as flooding and slips throughout the city and the resulting contaminated overflow impacting properties and the harbour. These events elevate the need for a robust storm water and sewerage regime.	Seeks that provisions be made in the District Plan to provide a robust storm water and sewerage regime. [Inferred decision requested]	Reject	No
Jane Szentivanyi and Ben Briggs	369.10	Energy Infrastructure and Transport / Three Waters / General THW	Not specified	Considers that substantial amounts of water have been leaking from the water system. 16 leaks have been notified, by the submitter, to the Council since the 8 March 2022 in various locations in Mt Victoria and the CBD. In some instances those leaks have comprised substantial amounts of water leaking from the water system.	Not specified.	Reject	No
Taranaki Whānui ki te Upoko o te Ika	389.53	Energy Infrastructure and Transport / Three Waters / General THW	Support in part	Support the direction of this chapter.	Support introduction direction, seeks amendment.	Accept	No
Taranaki Whānui ki te Upoko o te Ika	389.54	Energy Infrastructure and Transport / Three Waters / General THW	Amend	Amend to include role of Taranaki Whānui.	Seeks amendment to mention role of Taranaki Whānui transitioning to Entity C and Three Waters reform within introduction.	Reject	No
Kāinga Ora Homes and Communities	391.92	Energy Infrastructure and Transport / Three Waters / General THW	Support in part	The Three Waters chapter is generally supported, but references to Natural Hazard Overlays should be replaced with Natural Hazard Area.	Retain the Three Waters chapter with amendment.	Reject	No
Greater Wellington Regional Council	FS84.56	Part 2 / Energy Infrastructure and Transport / Three Waters / General THW	Oppose	Greater Wellington disagree with the submitter that the flood hazard maps should be removed from the Proposed District Plan and instead be held in a non-statutory GIS.	Disallow / Seeks that all flood hazard maps are included in the Proposed District Plan	Accept	No
Kāinga Ora Homes and Communities	391.93	Energy Infrastructure and Transport / Three Waters / General THW	Amend	Considers that the Three Waters chapter should be amended so that references to 'Natural Hazard Overlays' are replaced with 'Natural Hazard area'.	Amend the Three Waters chapter as follows: ... Other relevant District Plan Provisions ... - Natural Hazards - the Natural Hazards chapter addresses subdivision, use and development in the Natural Hazard <u>Overlays</u> areas.	Reject	No
Toka Tū Ake EQC	FS70.50	Part 2 / Energy Infrastructure and Transport / Three Waters / General THW	Oppose	MfE discussion paper on National Planning Standards: Zones and Overlays supports the use of the term 'overlay' to mean mapped areas which "introduce more restrictive built form controls than apply to the underlying zone". As this is the purpose of the WCC proposed plan's Natural Hazard Overlays, the term should be retained. Regulatory natural hazard overlays, including for flood, are an important tool to limit subdivision and development within areas subject to natural hazard risk.	Disallow	Accept	No
Survey & Spatial New Zealand Wellington Branch	439.8	Energy Infrastructure and Transport / Three Waters / General THW	Amend	Considers the discussion in the Introduction about hydraulic neutrality is forcing developments (particularly multi-unit developments) to over-compensate for stormwater discharges, and existing capacity constraints in Council infrastructure are reduced in favour of smaller developments. Considers that Council should instead focus on levying development contributions to fund additional infrastructure capacity to accommodate growth, with reference to the Financial Infrastructure Strategy 2021-2051.	Amend the Introduction to: The projected increase in urban development in the city will put additional pressure on the existing stormwater network due to increased runoff, with this likely to be further exacerbated by future climate change-induced flooding events. To address this, all new subdivision and development will need to demonstrate that the discharge quantity, and flow rate of associated stormwater runoff generated is no greater than the peak runoff and volumes discharged from the site in <u>its current or undeveloped</u> state. New development will also need to include water sensitive design methods, <u>where practical</u> , so that development contributes to promoting positive effects and avoids, remedies or mitigates adverse effects on the health and well-being of water. ... In response to these challenges, <u>Council has a significant role</u> , future growth and development in the city will be managed <u>via Council's programmed upgrades and also through</u> the District Plan to...	Accept in part	Yes
Survey & Spatial New Zealand Wellington Branch	439.9	Energy Infrastructure and Transport / Three Waters / General THW	Amend	Notes that "Managing Stormwater Runoff" document is not listed in documents incorporated by reference.	Amend list of materials incorporated by reference to include "Managing Stormwater Runoff"	Accept in part	No
Peter Jack	450.2	Energy Infrastructure and Transport / Three Waters / General THW	Not specified	Considers that more catchment or reservoir storage be looked at for the future. With all this excessive water we are getting in the winter now rather than let it go, store it.	Not specified.	Reject	No
Te Rūnanga o Toa Rangatira	488.37	Energy Infrastructure and Transport / Three Waters / General THW	Support in part	Supports inclusion of Te Mana o Te Wai in the Three Waters chapter.	Retain reference to Te Mana o Te Wai in the Three Waters Chapter as notified.	Accept	No
Te Rūnanga o Toa Rangatira	488.38	Energy Infrastructure and Transport / Three Waters / General THW	Support	Considers that the Three Waters chapter is a big step forward in improving the quality of freshwater impacted by land use activities and giving effect to NPS-FM.	Retain the Three Waters chapter as notified, subject to amendments below.	Accept	No
Te Rūnanga o Toa Rangatira	488.39	Energy Infrastructure and Transport / Three Waters / General THW	Amend	Considers that it is unclear how financial contributions can be used when stormwater treatment is needed offsite and how this can be incorporated into a Stormwater Management Plan and how costs can be determined.	Seeks that the Three Waters chapter in amended to include financial contributions to be made for offsite stormwater treatment and management.	Reject	No

The Retirement Villages Association of New Zealand Incorporated	FS126.213	Part 2 / Energy Infrastructure and Transport / Three Waters / General THW	Oppose	While clarification is needed on the relief sought, The RVA opposes the relief on the basis that it has the potential to affect the consenting of retirement villages. The RVA opposes any rules relating to financial contributions that allow 'double-dipping' with Council's Development Contributions Policy, do not provide clarity as to contributions payable and that do not take into account retirement villages' substantially lower demand profile compared to standard residential developments.	Disallow	Accept	No
Ryman Healthcare Limited	FS128.213	Part 2 / Energy Infrastructure and Transport / Three Waters / General THW	Oppose	While clarification is needed on the relief sought, Ryman opposes the relief on the basis that it has the potential to affect the consenting of retirement villages. Ryman opposes any rules relating to financial contributions that allow 'double-dipping' with Council's Development Contributions Policy, do not provide clarity as to contributions payable and that do not take into account retirement villages' substantially lower demand profile compared to standard residential developments.	Disallow	Accept	No
Wellington City Council	266.59	Energy Infrastructure and Transport / Three Waters / New THW	Amend	Considers addition of new THW-P6 needed as this policy is more appropriately located in the THW chapter. This policy has been relocated from the MRZ and HRZ chapters (MRZ-P9 and HRZ-P9) and amended to include 'and improve water quality'.	Add a new Policy in the Three Waters chapter as follows: <u>THW-P6 Permeable surface</u> <u>Require development to provide a minimum level of permeable surface to assist with reducing the rate and amount of storm water run-off and improve water quality.</u>	Accept	Yes
Greater Wellington Regional Council	FS84.3	Part 2 / Energy Infrastructure and Transport / Three Waters / New THW	Support	Greater Wellington agree that the MRZ and HRZ policy and permeable surface rules are better suited to the Three Waters Chapter and support the amendments.	Allow	Accept	Yes
Greater Wellington Regional Council	FS84.4	Part 2 / Energy Infrastructure and Transport / Three Waters / New THW	Support	Greater Wellington agree that the MRZ and HRZ policy and permeable surface rules are better suited to the Three Waters Chapter and support the amendments.	Allow	Accept	Yes
Wellington City Council Environmental Reference Group	FS112.12	Part 2 / Energy Infrastructure and Transport / Three Waters / New THW	Support	Support the inclusion of a new permeable surface provision in this chapter, as suggested. Including moving rules to this chapter; and suggest the rules should include development where there are more than four units.	Allow	Accept	Yes
The Retirement Villages Association of New Zealand Incorporated	FS126.238	Part 2 / Energy Infrastructure and Transport / Three Waters / New THW	Oppose	The RVA oppose the relief sought in this submission as it is inconsistent with The RVA's primary submission and the MDRS.	Disallow	Reject	No
Ryman Healthcare Limited	FS128.238	Part 2 / Energy Infrastructure and Transport / Three Waters / New THW	Oppose	Ryman oppose the relief sought in this submission as it is inconsistent with Ryman's primary submission and the MDRS.	Disallow	Reject	No
Wellington City Council	266.60	Energy Infrastructure and Transport / Three Waters / New THW	Amend	Considers this new rule arises from the deletion of MRZ-S10 (Permeable surface area) and HRZ[S10 (Permeable surface area) which have been combined and relocated from the Three Waters Chapter. Given that permeable surfaces are not a building provision, but a three waters/infrastructure provision, it is more logical to locate this policy in the THW chapter.	Add a new Rule in the Three Waters chapter as follows: Zones that this rule applies to: Medium Density and High-Density Residential Zones <u>THW-R7 Permeable Surface 1-3 residential units</u> <u>1. Activity status: Permitted</u> <u>Where:</u> <u>a. A minimum of 30% of the net site area is permeable surface.</u> <u>2. Activity status: Restricted Discretionary</u> <u>Where:</u> <u>a. Compliance with the requirements of THW-R7 1.a cannot be achieved.</u> <u>Matters of discretion are:</u> <u>1. Any measures used to mitigate stormwater runoff;</u> <u>2. The capacity of, and effects on, the stormwater network; and</u> <u>3. The matters in THW-P6.</u>	Accept	Yes
Greater Wellington Regional Council	FS84.5	Part 2 / Energy Infrastructure and Transport / Three Waters / New THW	Support	Greater Wellington agree that the MRZ and HRZ policy and permeable surface rules are better suited to the Three Waters Chapter and support the amendments.	Allow	Accept	Yes
Wellington City Council Environmental Reference Group	FS112.13	Part 2 / Energy Infrastructure and Transport / Three Waters / New THW	Support	Support the inclusion of a new permeable surface provision in this chapter, as suggested. Including moving rules to this chapter; and suggest the rules should include development where there are more than four units.	Allow	Accept	Yes

The Retirement Villages Association of New Zealand Incorporated	FS126.239	Part 2 / Energy Infrastructure and Transport / Three Waters / New THW	Oppose	The RVA oppose the relief sought in this submission as it is inconsistent with The RVA's primary submission and the MDRS.	Disallow	Reject	No
Ryman Healthcare Limited	FS128.239	Part 2 / Energy Infrastructure and Transport / Three Waters / New THW	Oppose	Ryman oppose the relief sought in this submission as it is inconsistent with Ryman's primary submission and the MDRS.	Disallow	Reject	No

Wellington City Council	266.61	Energy Infrastructure and Transport / Three Waters / New THW	Amend	Considers this new rule arises from the deletion of LLRZ-S9 (Permeable surface area) that has been relocated from the Three Waters Chapter. Given that permeable surfaces are not a building provision, but a three waters/infrastructure provision, it is more logical to locate this policy in the THW chapter.	Add a new Rule in the Three Waters chapter as follows: Zones that this rule applies to: Large Lot Residential Zone <u>THW-R8 Large Lot Residential Zone</u> <u>1. Activity status: Permitted Where:</u> <u>a. A minimum of 60% of the net site area is permeable surface.</u> <u>2. Activity status: Restricted Discretionary Where:</u> <u>a. Compliance with the requirements of THW[R8.1.a cannot be achieved.</u> <u>Matters of discretion are:</u> <u>a. Any measures used to mitigate stormwater runoff;</u> <u>b. The capacity of, and effects on, the stormwater network; and</u> <u>c. The matters in THW-P6.</u>	Accept	Yes
Greater Wellington Regional Council	FS84.6	Part 2 / Energy Infrastructure and Transport / Three Waters / New THW	Support	Greater Wellington agree that the MRZ and HRZ policy and permeable surface rules are better suited to the Three Waters Chapter and support the amendments.	Allow	Accept	Yes
Wellington City Council Environmental Reference Group	FS112.14	Part 2 / Energy Infrastructure and Transport / Three Waters / New THW	Support	Support the inclusion of a new permeable surface provision in this chapter, as suggested. Including moving rules to this chapter; and suggest the rules should include development where there are more than four units.	Allow	Accept	Yes
The Retirement Villages Association of New Zealand Incorporated	FS126.240	Part 2 / Energy Infrastructure and Transport / Three Waters / New THW	Oppose	The RVA oppose the relief sought in this submission as it is inconsistent with The RVA's primary submission and the MDRS.	Disallow	Reject	No
Ryman Healthcare Limited	FS128.240	Part 2 / Energy Infrastructure and Transport / Three Waters / New THW	Oppose	Ryman oppose the relief sought in this submission as it is inconsistent with Ryman's primary submission and the MDRS.	Disallow	Reject	No
The Sustainability Society	339.3	Energy Infrastructure and Transport / Three Waters / New THW	Amend	Considers that the Three Water chapter should have a rule requiring a retention depth metric for future development at all scales. Retention of stormwater to manage stormwater volumes to avoid flashy rainfall runoff requires an initial depth of rainfall to be captured and not allowed to discharge as stormwater. where soils allow, this can be via infiltration but in Wellington is likely to require rainwater harvest and reuse to reduce volume which is fundamental to mimic natural losses from vegetation and undeveloped soils. In other jurisdictions this retention depth generally varies from 5 - 10 mm.	Add a rule in the 'Three Waters' chapter requiring a retention depth for future developments of all scales.	Reject	No
The Sustainability Society	339.4	Energy Infrastructure and Transport / Three Waters / New THW	Amend	Considers that new rules relating to how future development will manage stormwater for contaminants and changed frequent flow hydrology are needed. At present GWRC is looking to have limits for water quality but WCC should be mandating means of meeting these limits through clear and enforceable rules. Without these rules there will be limited ability for WCC, WWL or future Entity C to ensure that development does not persist to degrade freshwater and coastal ecosystems and not uphold the intent of Te Mana o Te Wai and aspirations of mana whenua groups as expressed through the Whaitua process.	Seeks to add new rules in the 'Three Waters' chapter mandating water quality management and limits for future development.	Reject	No
Greater Wellington Regional Council	351.76	Energy Infrastructure and Transport / Three Waters / New THW	Amend	Considers it appropriate to give effect to Section 77E(2) of the RMA and have regard to Proposed RPS Change 1 (Policy FW.4).	Seeks a new policy regarding financial contributions to be paid where stormwater treatment and management is provided offsite under a Stormwater Management Plan.	Reject	No
The Retirement Villages Association of New Zealand Incorporated	FS126.56	Part 2 / Energy Infrastructure and Transport / Three Waters / New THW	Oppose	The RVA opposes the relief sought in this submission point, as it has the potential to affect the consenting of retirement villages. The RVA opposes any rules relating to financial contributions that allow 'double-dipping' with Council's Development Contributions Policy, do not provide clarity as to contributions payable and that do not take into account retirement villages' substantially lower demand profile compared to standard residential developments.	Disallow / Disallow submission point, or amend the relief sought to ensure a clear and proportionate financial contributions regime that prevents double dipping, provides clarity as to contributions payable, and provides a retirement-village specific regime that takes into account retirement villages' substantially lower demand profile compared to standard residential developments.	Accept	No
Ryman Healthcare Limited	FS128.56	Part 2 / Energy Infrastructure and Transport / Three Waters / New THW	Oppose	Ryman opposes the relief sought in this submission point, as it has the potential to affect the consenting of retirement villages. Ryman opposes any rules relating to financial contributions that allow 'double-dipping' with Council's Development Contributions Policy, do not provide clarity as to contributions payable and that do not take into account retirement villages' substantially lower demand profile compared to standard residential developments.	Disallow / Disallow submission point, or amend the relief sought to ensure a clear and proportionate financial contributions regime that prevents double dipping, provides clarity as to contributions payable, and provides a retirement-village specific regime that takes into account retirement villages' substantially lower demand profile compared to standard residential developments.	Accept	No
Greater Wellington Regional Council	351.77	Energy Infrastructure and Transport / Three Waters / New THW	Amend	Considers it appropriate to give effect to Section 77E(2) of the RMA and have regard to Proposed RPS Change 1 (Policy FW.4).	Seeks to Add permitted, controlled or restricted discretionary activity rules with an associated permitted standard, matter of control or matter of discretion (if necessary) that requires payment of the financial contribution (where not already collected as development contribution) (separate or part of subdivision rule conditions).	Reject	No
The Retirement Villages Association of New Zealand Incorporated	FS126.57	Part 2 / Energy Infrastructure and Transport / Three Waters / New THW	Oppose	The RVA opposes the relief sought in this submission point, as it has the potential to affect the consenting of retirement villages. The RVA opposes any rules relating to financial contributions that allow 'double-dipping' with Council's Development Contributions Policy, do not provide clarity as to contributions payable and that do not take into account retirement villages' substantially lower demand profile compared to standard residential developments.	Disallow / Disallow submission point, or amend the relief sought to ensure a clear and proportionate financial contributions regime that prevents double dipping, provides clarity as to contributions payable, and provides a retirement-village specific regime that takes into account retirement villages' substantially lower demand profile compared to standard residential developments.	Accept	No

Ryman Healthcare Limited	FS128.57	Part 2 / Energy Infrastructure and Transport / Three Waters / New THW	Oppose	Ryman opposes the relief sought in this submission point, as it has the potential to affect the consenting of retirement villages. Ryman opposes any rules relating to financial contributions that allow 'double-dipping' with Council's Development Contributions Policy, do not provide clarity as to contributions payable and that do not take into account retirement villages' substantially lower demand profile compared to standard residential developments.	Disallow / Disallow submission point, or amend the relief sought to ensure a clear and proportionate financial contributions regime that prevents double dipping, provides clarity as to contributions payable, and provides a retirement-village specific regime that takes into account retirement villages' substantially lower demand profile compared to standard residential developments.	Accept	No
Greater Wellington Regional Council	351.78	Energy Infrastructure and Transport / Three Waters / New THW	Amend	Considers it appropriate to give effect to Section 77E(2) of the RMA and have regard to Proposed RPS Change 1 (Policy FW.4).	Seeks to include discretionary, non-complying or prohibited activity rule where any required financial contribution is not paid.	Reject	No
The Retirement Villages Association of New Zealand Incorporated	FS126.58	Part 2 / Energy Infrastructure and Transport / Three Waters / New THW	Oppose	The RVA opposes the relief sought in this submission point, as it has the potential to affect the consenting of retirement villages. The RVA opposes any rules relating to financial contributions that allow 'double-dipping' with Council's Development Contributions Policy, do not provide clarity as to contributions payable and that do not take into account retirement villages' substantially lower demand profile compared to standard residential developments.	Disallow / Disallow submission point, or amend the relief sought to ensure a clear and proportionate financial contributions regime that prevents double dipping, provides clarity as to contributions payable, and provides a retirement-village specific regime that takes into account retirement villages' substantially lower demand profile compared to standard residential developments.	Accept	No
Ryman Healthcare Limited	FS128.58	Part 2 / Energy Infrastructure and Transport / Three Waters / New THW	Oppose	Ryman opposes the relief sought in this submission point, as it has the potential to affect the consenting of retirement villages. Ryman opposes any rules relating to financial contributions that allow 'double-dipping' with Council's Development Contributions Policy, do not provide clarity as to contributions payable and that do not take into account retirement villages' substantially lower demand profile compared to standard residential developments.	Disallow / Disallow submission point, or amend the relief sought to ensure a clear and proportionate financial contributions regime that prevents double dipping, provides clarity as to contributions payable, and provides a retirement-village specific regime that takes into account retirement villages' substantially lower demand profile compared to standard residential developments.	Accept	No
Greater Wellington Regional Council	351.79	Energy Infrastructure and Transport / Three Waters / New THW	Amend	Considers it appropriate to give effect to Section 77E(2) of the RMA and have regard to Proposed RPS Change 1 (Policy FW.4).	Seeks to add a method for determining the costs of the contribution may need to be a schedule or appendix.	Reject	No
The Retirement Villages Association of New Zealand Incorporated	FS126.59	Part 2 / Energy Infrastructure and Transport / Three Waters / New THW	Oppose	The RVA opposes the relief sought in this submission point, as it has the potential to affect the consenting of retirement villages. The RVA opposes any rules relating to financial contributions that allow 'double-dipping' with Council's Development Contributions Policy, do not provide clarity as to contributions payable and that do not take into account retirement villages' substantially lower demand profile compared to standard residential developments.	Disallow / Disallow submission point, or amend the relief sought to ensure a clear and proportionate financial contributions regime that prevents double dipping, provides clarity as to contributions payable, and provides a retirement-village specific regime that takes into account retirement villages' substantially lower demand profile compared to standard residential developments.	Accept	No
Ryman Healthcare Limited	FS128.59	Part 2 / Energy Infrastructure and Transport / Three Waters / New THW	Oppose	Ryman opposes the relief sought in this submission point, as it has the potential to affect the consenting of retirement villages. Ryman opposes any rules relating to financial contributions that allow 'double-dipping' with Council's Development Contributions Policy, do not provide clarity as to contributions payable and that do not take into account retirement villages' substantially lower demand profile compared to standard residential developments.	Disallow / Disallow submission point, or amend the relief sought to ensure a clear and proportionate financial contributions regime that prevents double dipping, provides clarity as to contributions payable, and provides a retirement-village specific regime that takes into account retirement villages' substantially lower demand profile compared to standard residential developments.	Accept	No
Greater Wellington Regional Council	351.80	Energy Infrastructure and Transport / Three Waters / New THW	Support in part	Supports the policy direction provided in the Three Waters chapter regarding development occurring where there is sufficient infrastructure to serve the demand.	Retain provision, subject to amendments, as outlined other submission points.	Accept	No
Greater Wellington Regional Council	351.81	Energy Infrastructure and Transport / Three Waters / New THW	Amend	Considers the current policies do not include consideration of how climate change may influence existing water supplies and existing demand for water.	Seeks to Add a new policy to require new development to ensure adequate available water supply including consideration of how climate change may affect existing supplies and the need to develop further water supply sources as a result.	Reject	No
Greater Wellington Regional Council	351.82	Energy Infrastructure and Transport / Three Waters / New THW	Amend	Considers the proposed RPS Change 1 (Policy FW.2) requires district plans to include policies, rules or method to reduce the demand for water, including where practicable improving the efficiency of the end use of water.	Seeks a new policy to encourage water use efficiency and for development design to manage water demand	Reject	No
Tyers Stream Group	221.9	Energy Infrastructure and Transport / Three Waters / THW-O1	Support	Supports THW-O1.	Retain THW-O1 (Protecting water bodies and freshwater ecosystems) as notified.	Accept	No
Claire Nolan, James Fraser, Biddy Bunzl, Margaret Franken, Michelle Wolland, and Lee Muir	275.9	Energy Infrastructure and Transport / Three Waters / THW-O1	Support	Supports THW-O1 (Protecting water bodies and freshwater ecosystems).	Retain THW-O1 (Protecting water bodies and freshwater ecosystems) as notified.	Accept	No
Heidi Snelson, Aman Hunt, Chia Hunt, Ela Hunt	276.6	Energy Infrastructure and Transport / Three Waters / THW-O1	Not specified	Considers "Well functioning urban environment" does not apply to THW-O1 because it does not comply with points d, f & g in the definition of "Well functioning urban environment" within the PDP. There is no link road from the development site to Churton Park, Glenside or Tawa has been planned. Development area is an isolated area on steep, hilly terrain. The access road from Westchester Drive is flood prone. West Glenside at 395 Middleton Road will not be Climate Change Sustainable and Natural Hazard Resilient. [Refer to original submission for full reason]	Not specified.	Reject	No

WCC Environmental Reference Group	377.25	Energy Infrastructure and Transport / Three Waters / THW-01	Support	Support this objective as written. Protecting water bodies and freshwater ecosystems from the negative effects of development, and where possible ensuring subdivision contributes to overall improvement is very positive. This objective gives effect to clause 3.5 of NPS-FM 2020, particularly subclause (c) requiring local authorities to manage land use and development in an integrated and sustainable way to avoid, remedy or mitigate adverse effects of water bodies.	Retain THW-01 (Protecting water bodies and freshwater ecosystems) as notified.	Accept	No
Tyers Stream Group	221.10	Energy Infrastructure and Transport / Three Waters / THW-02	Support	Supports THW-02.	Retain THW-02 (Infrastructure-enabled urban development) as notified.	Accept	No
Tyers Stream Group	221.11	Energy Infrastructure and Transport / Three Waters / THW-02	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks amendment to THW-02 (Infrastructure-enabled urban development) to require that sufficient capacity be in place before and subdivision, use or development takes place.	Accept in part	No
Fire and Emergency New Zealand	273.21	Energy Infrastructure and Transport / Three Waters / THW-02	Support	Support the objective as it seeks to enable development in urban areas of the city where there is sufficient or planned Three Waters infrastructure capacity or, where this is not possible, development can be satisfactorily serviced by other means.	Retain THW-02 (Infrastructure-enabled urban development) as notified.	Accept	No
Heidi Snelson, Aman Hunt, Chia Hunt, Ela Hunt	276.7	Energy Infrastructure and Transport / Three Waters / THW-02	Not specified	Considers that "Well functioning urban environment" does not apply to THW-02 because it does not comply with points d, f & g in the definition of "Well functioning urban environment" within the PDP. There is no link road from the development site to Churton Park, Glenside or Tawa has been planned. Development area is an isolated area on steep, hilly terrain. The access road from Westchester Drive is flood prone. West Glenside at 395 Middleton Road will not be Climate Change Sustainable and Natural Hazard Resilient. [Refer to original submission for full reason]	Not specified.	Reject	No
Retirement Villages Association of New Zealand Incorporated	350.27	Energy Infrastructure and Transport / Three Waters / THW-02	Support	Supports provision for development where there is sufficient existing or planned infrastructure capacity or alternative servicing is available [Note, the submitter incorrectly references THW-02].	Retain THW-02 (Infrastructure-enabled urban development) as notified.	Accept	No
WCC Environmental Reference Group	377.26	Energy Infrastructure and Transport / Three Waters / THW-02	Support	Supportive of development occurring in places where three waters are already in place.	Retain THW-02 (Infrastructure-enabled urban development) as notified.	Accept	No
Kāinga Ora Homes and Communities	391.94	Energy Infrastructure and Transport / Three Waters / THW-02	Support	Objective THW-02 is generally supported, particularly as it recognises alternative means of servicing development where existing infrastructure is at capacity.	Retain Objective THW-02 (Infrastructure-enabled urban development) as notified.	Accept	No
Survey & Spatial New Zealand Wellington Branch	439.10	Energy Infrastructure and Transport / Three Waters / THW-02	Amend	Considers the objective should also refer to Council's ability to fund infrastructure via development contributions.	Amend THW-02 (Infrastructure enabled urban development) to: Enable subdivision, use or development in urban areas where: 1. Sufficient existing or planned three waters infrastructure capacity and/or level of service is, or will be, available to service the use or development; or 2. <u>Development contributions are levied for infrastructure upgrades, or</u> 3. It can be satisfactorily serviced through an alternative means where existing three waters infrastructure capacity and/or level of service is insufficient.	Reject	No
Trelissick Park Group	168.4	Energy Infrastructure and Transport / Three Waters / THW-03	Support	Supports that THW-03 (Hydraulic Neutrality) covers stormwater hydraulic neutrality and water sensitive design.	Retain THW-03 (Hydraulic Neutrality) as notified.	Accept	No
Tyers Stream Group	221.12	Energy Infrastructure and Transport / Three Waters / THW-03	Support	Supports THW-03.	Retain THW-03 (Hydraulic neutrality) as notified.	Accept	No
Stratum Management Limited	249.1	Energy Infrastructure and Transport / Three Waters / THW-03	Oppose	Considers that the objective seeks that there is no increase in offsite stormwater peak flows and volumes as a result of new development. While this approach seeks to capture existing practice, particularly in respect of residential development where there are stormwater constraints, its universal applicability, and applicability to the City Centre zone is opposed. Policy THW-P5 supports this objective and is discussed below.	Amend THW-03 (Hydraulic neutrality) to support stormwater attenuation where there are infrastructure constraints.	Reject	No
Stratum Management Limited	249.2	Energy Infrastructure and Transport / Three Waters / THW-03	Oppose	Considers that the objective seeks that there is no increase in offsite stormwater peak flows and volumes as a result of new development. While this approach seeks to capture existing practice, particularly in respect of residential development where there are stormwater constraints, its universal applicability, and applicability to the City Centre zone is opposed. Policy THW-P5 supports this objective and is discussed below.	Amend THW-03 (Hydraulic neutrality) to remove its applicability to the City Centre zone.	Accept	Yes
Stratum Management Limited	249.3	Energy Infrastructure and Transport / Three Waters / THW-03	Oppose	Considers that the objective seeks that there is no increase in offsite stormwater peak flows and volumes as a result of new development. While this approach seeks to capture existing practice, particularly in respect of residential development where there are stormwater constraints, its universal applicability, and applicability to the City Centre zone is opposed. Policy THW-P5 supports this objective and is discussed below.	Amend THW-03 (Hydraulic neutrality) in line with the relief sought to Policy THW-P5.	Accept	Yes

Heidi Snelson, Aman Hunt, Chia Hunt, Ela Hunt	276.8	Energy Infrastructure and Transport / Three Waters / THW-O3	Not specified	<p>Considers that "Well functioning urban environment" does not apply to THW-O3 because it does not comply with points d, f & g in the definition of "Well functioning urban environment" within the PDP.</p> <p>There is no link road from the development site to Churton Park, Glenside or Tawa has been planned.</p> <p>Development area is an isolated area on steep, hilly terrain.</p> <p>The access road from Westchester Drive is flood prone.</p> <p>West Glenside at 395 Middleton Road will not be Climate Change Sustainable and Natural Hazard Resilient.</p> <p>[Refer to original submission for full reason]</p>	Not specified.	Reject	No
Retirement Villages Association of New Zealand Incorporated	350.28	Energy Infrastructure and Transport / Three Waters / THW-O3	Oppose in part	Opposes requiring hydraulic neutrality in all cases including where there is sufficient capacity in the downstream system and/or the effects of increased water flows can be managed effectively.	Delete THW-O3 (Hydraulic neutrality) in its entirety as notified.	Reject	No
WCC Environmental Reference Group	377.27	Energy Infrastructure and Transport / Three Waters / THW-O3	Amend	Supports hydraulic neutrality but considers that the inclusion of 'in urban areas' is limiting/restrictive. Notes that THW-P5 (Hydraulic Neutrality) does not restrict to urban areas. Notes that a large development in rural areas may therefore be exempt from the objective.	<p>Amend THW-O3 (Hydraulic Neutrality) as follows:</p> <p>There is no increase in offsite stormwater peak flows and volumes as a result of subdivision, use and development in urban areas.</p> <p>Add a definition for 'urban areas' to the interpretation section of the Plan.</p>	Reject	No
Kāinga Ora Homes and Communities	391.95	Energy Infrastructure and Transport / Three Waters / THW-O3	Support	Objective THW-O3 is generally supported.	Retain Objective THW-O3 (Hydraulic neutrality) as notified.	Accept	No
Survey & Spatial New Zealand Wellington Branch	439.11	Energy Infrastructure and Transport / Three Waters / THW-O3	Amend	Considers hydraulic neutrality should refer to the current disposition of a site.	<p>Amend THW-O3 (Hydraulic neutrality) to:</p> <p>There is no increase in offsite stormwater peak flows and volumes <u>from current levels</u> as a result of subdivision, use and development in urban areas</p>	Accept	Yes
Trelissick Park Group	168.5	Energy Infrastructure and Transport / Three Waters / THW-P1	Support	Supports that THW-P1 (Water sensitive design) covers stormwater hydraulic neutrality and water sensitive design.	Retain THW-P1 (Water sensitive design) as notified.	Accept	No
Tyers Stream Group	221.13	Energy Infrastructure and Transport / Three Waters / THW-P1	Support	Supports THW-P1.	Retain THW-P1 (Water sensitive design) as notified.	Accept	No
Stratum Management Limited	249.4	Energy Infrastructure and Transport / Three Waters / THW-P1	Oppose	Considers that the policy introduces a universal requirement for the incorporation of water sensitive design methods. This requirement will impose additional development costs and does not specify what level of sufficiency is to be achieved in addressing the policy.	Remove THW-P1 (Water sensitive design) or appropriately qualify the policy.	Reject	No
Wellington City Council	266.62	Energy Infrastructure and Transport / Three Waters / THW-P1	Amend	Considers change will integrate "first flush" measures into the policies in accordance with the adopted amendments by the Wellington City Council Planning and Environment Committee on 23 June 2022.	<p>Amend THW-P1 (Water sensitive design) as follows:</p> <p>Water sensitive design methods are incorporated into new subdivision and development and they are designed, constructed and maintained to:</p> <ol style="list-style-type: none"> 1. Improve the health and well-being of water bodies and freshwater ecosystems; 2. Avoid or mitigate off-site effects from surface water runoff; 3. <u>Address effects of first flush</u>; 4. 5. Demonstrate best practice approach to the management of stormwater quality and quantity; 5. 6. Reduce demand on water supplies; and 6. 7. Reduce wastewater overflows. 	Accept in part	No
Greater Wellington Regional Council	FS84.7	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-P1	Support	<p>Greater Wellington agree that the MRZ and HRZ policy and permeable surface rules are better suited to the Three Waters Chapter and support the amendments.</p> <p>GW Support the submitters requested changes to THW-P1 as this would have better regard to proposed RPS change 1.</p>	Allow	Accept in part	No

Heidi Snelson, Aman Hunt, Chia Hunt, Ela Hunt	276.9	Energy Infrastructure and Transport / Three Waters / THW-P1	Not specified	Considers that "Well functioning urban environment" does not apply to THW-P1 because it does not comply with points d, f & g in the definition of "Well functioning urban environment" within the PDP. There is no link road from the development site to Churton Park, Glenside or Tawa has been planned. Development area is an isolated area on steep, hilly terrain. The access road from Westchester Drive is flood prone. West Glenside at 395 Middleton Road will not be Climate Change Sustainable and Natural Hazard Resilient. [Refer to original submission for full reason]	Not specified.	Reject	No
Phillippa O'Connor	289.5	Energy Infrastructure and Transport / Three Waters / THW-P1	Amend	Considers that in many instances in urban environments typical water sensitive design methods (swales, raingardens and other space-intensive activities) will not be able to be accommodated while fulfilling the other design requirements of the Plan and as such this amendment seeks to avoid conflict between policies in this regard.	Amend THW-P1 (Water sensitive design) as follows: Water sensitive design methods are incorporated into <u>promoted in</u> new subdivision and development and they are designed, constructed and maintained to: 1. Improve the health and well-being of water bodies and freshwater ecosystems; 2. Avoid or mitigate off-site effects from surface water runoff; 3. Demonstrate best practice approach to the management of stormwater quality and quantity; 4. Reduce demand on water supplies; and 5. Reduce wastewater overflows.	Reject	No
Mt Victoria Residents' Association	342.20	Energy Infrastructure and Transport / Three Waters / THW-P1	Support	Supports Water Sensitive Urban Design as an essential feature of neighbourhoods to manage and improve stormwater quality and run-off. The WSUD car parking along Evans Bay Parade by Kilbirnie Park should be the standard for on-street car parking, with appropriate accessible crossing places. This will have the huge added advantage of slowing cars down near the kerb. Assurance should be provided that the water system will be robust enough to support the community throughout the life of the District Plan.	Retain THW-P1 (Water sensitive design) as notified.	Accept	No
Retirement Villages Association of New Zealand Incorporated	350.29	Energy Infrastructure and Transport / Three Waters / THW-P1	Oppose in part	Opposes aspects of this policy that are not linked to the effects of the particular development e.g. improving (as opposed to maintaining) the health and wellbeing of water bodies and freshwater ecosystems and reducing wastewater overflows which should not be the responsibility of new development, when existing issues have been caused by historic development.	Opposes THW-P1 (Water sensitive design) and seeks amendment.	Reject	No
Retirement Villages Association of New Zealand Incorporated	350.30	Energy Infrastructure and Transport / Three Waters / THW-P1	Amend	Opposes aspects of this policy that are not linked to the effects of the particular development e.g. improving (as opposed to maintaining) the health and wellbeing of water bodies and freshwater ecosystems and reducing wastewater overflows which should not be the responsibility of new development, when existing issues have been caused by historic development.	Seeks amendment to THW-P1 (Water sensitive design) to remove parts of the policy that are not linked to the effects of the particular development.	Reject	No
Greater Wellington Regional Council	351.83	Energy Infrastructure and Transport / Three Waters / THW-P1	Support in part	Supports the use of water sensitive design methods to achieve the matters listed in 1 to 5 of THW-P1.	Retain provision, subject to amendments, as outlined other submission points.	Accept	No
Greater Wellington Regional Council	351.84	Energy Infrastructure and Transport / Three Waters / THW-P1	Amend	Considers that to have regard to Policy FW.3 in Proposed RPS Change 1, this policy should go further to also achieve other amenity, recreational, climate, and cultural outcomes.	Amend THW-P1 (Water sensitive design) to include an additional sub-clause: <u>6. where feasible, provide for multiple uses including improving amenity, recreation, cultural, ecological and climate values.</u>	Reject	No
Greater Wellington Regional Council	351.85	Energy Infrastructure and Transport / Three Waters / THW-P1	Amend	Considers that clause 5 of THW-P1 to, 'reduce wastewater overflows,' should specify the extent of reduction sought, as the outcome of this policy will be integral to achieving outcomes sought by Te Mahere Wai and Te Whanganui-a-Tara Whaitua Implementation Programme, as well as Proposed RPS Change 1 (Policy 42(r)) which seeks support for growth and consideration of different approaches to wastewater management to resolve overflows	Seeks for WCC to consider specifying the extent of reduction in wastewater overflows sought, including any necessary consequential amendments.	Reject	No
Woolworths New Zealand	359.23	Energy Infrastructure and Transport / Three Waters / THW-P1	Support	The incorporation of water sensitive design for all new developments is generally supported, but an amendment is sought. [Refer to original submission for full reason]	Retain THW-P1 (Water sensitive design) with amendment.	Accept	No
Woolworths New Zealand	359.24	Energy Infrastructure and Transport / Three Waters / THW-P1	Amend	Considers that the incorporation of water sensitive design for all new developments should be promoted rather than required in THW-P1. There are many instances in urban environments where typical water sensitive design methods (swales, raingardens and other space-intensive activities) will not be able to be accommodated while fulfilling the other design requirements of the Plan and as such this amendment seeks to avoid conflict between policies in this regard.	Amend THW-P1 (Water sensitive design) as follows: Water sensitive design methods are incorporated into <u>promoted in</u> new subdivision and development and they are designed, constructed and maintained to: 1. Improve the health and well-being of water bodies and freshwater ecosystems; 2. Avoid or mitigate off-site effects from surface water runoff; 3. Demonstrate best practice approach to the management of stormwater quality and quantity; 4. Reduce demand on water supplies; and 5. Reduce wastewater overflows.	Reject	No

WCC Environmental Reference Group	377.28	Energy Infrastructure and Transport / Three Waters / THW-P1	Amend	Generally supportive but considers that point 5 is unclear in what it is trying to achieve. Unclear if it is trying to reduce wastewater overflows city wide or reduce wastewater overflows in comparison to the status quo. Considers that the wording of Point 5 should seek to avoid wastewater overflows. This would be in line with the objectives of the National Policy Statement for Freshwater Management 2020 (NPS-FM).	Amend Point 5 of THW-P1 (Water Sensitive Design) as follows: ... 5. Reduce <u>Avoid</u> wastewater overflows <u>wherever practicable</u> .	Accept	Yes
The Retirement Villages Association of New Zealand Incorporated	FS126.215	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-P1	Oppose	The RVA oppose the relief sought in this submission as it is inconsistent with The RVA's primary submission.	Disallow	Reject	No
Ryman Healthcare Limited	FS128.215	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-P1	Oppose	Ryman oppose the relief sought in this submission as it is inconsistent with Ryman's primary submission.	Disallow	Reject	No
Kāinga Ora Homes and Communities	391.96	Energy Infrastructure and Transport / Three Waters / THW-P1	Support	THW-P1 is generally supported.	Retain THW-P1 (Water sensitive design) as notified.	Accept	No
Survey & Spatial New Zealand Wellington Branch	439.12	Energy Infrastructure and Transport / Three Waters / THW-P1	Amend	Considers that as the definition of "water sensitive urban design" is concerned with managing stormwater at its source, it cannot be used to seek reductions in wastewater overflows in Council sewage networks.	Amend THW-P1 (Water sensitive design) to: Water sensitive design methods are incorporated into new subdivision and development and they are designed, constructed and maintained to: 1. Improve the health and well-being of water bodies and freshwater ecosystems; 2. Avoid or mitigate off-site effects from surface water runoff; 3. Demonstrate best practice approach to the management of stormwater quality and quantity; and 4. Reduce demand on water supplies; and 5. Reduce wastewater overflows	Reject	No
Te Rūnanga o Toa Rangatira	488.40	Energy Infrastructure and Transport / Three Waters / THW-P1	Support in part	Supports the use of water sensitive urban design in the policy.	Retain THW-P1 (Water sensitive design) as notified subject to the amendments below.	Accept	No
Te Rūnanga o Toa Rangatira	488.41	Energy Infrastructure and Transport / Three Waters / THW-P1	Amend	Considers that THW-P1 needs strengthened to specify the reduction sought.	Amend THW-P1 (Water sensitive design) to: Water sensitive design methods are incorporated into new subdivision and development and they are designed, constructed and maintained to: 1. Improve the health and well-being of water bodies and freshwater ecosystems; 2. Avoid or mitigate off-site effects from surface water runoff; 3. Demonstrate best practice approach to the management of stormwater quality and quantity; 4. Reduce demand on water supplies; and 5. Reduce wastewater overflows so that the objectives of Te Whanganui a Tara and Porirua Whaitua implementation can be delivered.	Reject	No
Te Rūnanga o Toa Rangatira	488.42	Energy Infrastructure and Transport / Three Waters / THW-P1	Amend	Considers that a new clause is needed in THW-P1 to acknowledge the role that water sensitive urban design has contribution to lower catchment outcomes.	Amend THW-P1 (Water sensitive design) to include a new clause that acknowledges the role of Water Sensitive Urban Design in Wellington City to contribute positively to the Porirua Harbour lower catchment outcomes.	Reject	No
Tyers Stream Group	221.14	Energy Infrastructure and Transport / Three Waters / THW-P2	Support	Supports THW-P2.	Retain THW-P2 (Building materials) as notified.	Accept	No
Rimu Architects Ltd	318.14	Energy Infrastructure and Transport / Three Waters / THW-P2	Amend	Considers that TW-P2 fails to acknowledge that where roof water is used as drinking water, the use of copper roofing and downpipes enhances its safety. While this will only matter where access to reticulated water is not guaranteed, the policy should acknowledge this.	Amend THW-P2 (Building materials) to acknowledge the use of copper roofing and downpipes enhances the safety of roof water when it is used as drinking water.	Reject	No
WCC Environmental Reference Group	377.29	Energy Infrastructure and Transport / Three Waters / THW-P2	Support	Supportive and the Policy gives effect to Policy 3 of the NPS-FM.	Retain THW-P2 (Building Materials) as notified.	Accept	No
Kāinga Ora Homes and Communities	391.97	Energy Infrastructure and Transport / Three Waters / THW-P2	Support in part	THW-P2 is generally supported and an amendment is sought.	Retain THW-P2 (Building Materials) with amendment.	Accept	No
Kāinga Ora Homes and Communities	391.98	Energy Infrastructure and Transport / Three Waters / THW-P2	Amend	Considers that THW-P2 should be amended, as the use of avoid in the policy does not match the rule setting for non-compliance (restricted discretionary activity) and it may be appropriate to use these building materials in some instances where there are no impacts on the stormwater system.	Amend THW-P2 (Building Materials) as follows: The use of copper and zinc building materials is avoided or the effects of copper and zinc entering the stormwater system from the use as roofing and guttering materials are mitigated through the use of appropriate treatment.	Accept	Yes
Greater Wellington Regional Council	FS84.76	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-P2	Oppose	Greater Wellington oppose the submitter's suggested amendment to THW-P2 as it weakens the policy approach to this matter. The wording as notified has better regard to Proposed RPS Change 1. The issue raised by the submitter in relation to the applicable rule status is not significant as the policy has two arms, the first being avoid and the second being to manage effects.	Disallow / Seeks that THW-P2 is retained as notified.	Reject	No

Tyers Stream Group	221.15	Energy Infrastructure and Transport / Three Waters / THW-P3	Support	Supports THW-P3.	Retain THW-P3 (Infrastructure-enabled urban development) with amendment.	Accept	No
Tyers Stream Group	221.16	Energy Infrastructure and Transport / Three Waters / THW-P3	Amend	Considers that this would fit with the requirements of THW-P4.	Seeks that THW-P3 (Infrastructure-enabled urban development) be amended to require that sufficient capacity be in place before and subdivision, use or development takes place.	Reject	No
Fire and Emergency New Zealand	273.22	Energy Infrastructure and Transport / Three Waters / THW-P3	Support	Supports the policy as it seeks to enable development in urban areas where there is sufficient existing or planned capacity to accommodate the development to meet growth demand in the short to medium term.	Retain THW-P3 (Infrastructure-enabled urban development) as notified.	Accept	No
Claire Nolan, James Fraser, Biddy Bunzl, Margaret Franken, Michelle Wolland, and Lee Muir	275.10	Energy Infrastructure and Transport / Three Waters / THW-P3	Support	Supports THW-P3 (Infrastructure-enabled urban development).	Retain THW-P3 (Infrastructure-enabled urban development) as notified.	Accept	No
Retirement Villages Association of New Zealand Incorporated	350.31	Energy Infrastructure and Transport / Three Waters / THW-P3	Support in part	Considers that these policies overlap creating interpretation issues. Supports provision for development where there is sufficient existing or planned infrastructure capacity or alternative servicing is available.	Retain THW-P3 (Infrastructure-enabled urban development) and seeks amendment.	Accept	No
Retirement Villages Association of New Zealand Incorporated	350.32	Energy Infrastructure and Transport / Three Waters / THW-P3	Amend	Considers that these policies overlap creating interpretation issues. Supports provision for development where there is sufficient existing or planned infrastructure capacity or alternative servicing is available.	Amend THW-P3 (Infrastructure-enabled urban development) to remove overlap within THW-P4 (Three waters infrastructure servicing) and ensure the policies provide for alternative servicing where there is not existing/planned capacity.	Reject	No
WCC Environmental Reference Group	377.30	Energy Infrastructure and Transport / Three Waters / THW-P3	Support	THW-P3 is supported for its intent of concentrating subdivision and development in areas where existing three waters infrastructure is in place. This aligns with the NPS-FM.	Retain THW-P3 (Infrastructure-enabled urban development) as notified.	Accept	No
Kāinga Ora Homes and Communities	391.99	Energy Infrastructure and Transport / Three Waters / THW-P3	Support	THW-P3 is generally supported.	Retain THW-P3 (Infrastructure-enabled urban development) as notified.	Accept	No
Survey & Spatial New Zealand Wellington Branch	439.13	Energy Infrastructure and Transport / Three Waters / THW-P3	Amend	Considers that enabling infrastructure should also refer to Council's ability to fund development via Development Contributions	Amend THW-P3 (Infrastructure enabled urban development) to: New subdivision, use or development is enabled in urban areas that have existing or planned three waters infrastructure capacity, <u>including via development contributions</u> , to meet growth demand in the short to medium term	Reject	No
Tyers Stream Group	221.17	Energy Infrastructure and Transport / Three Waters / THW-P4	Support	Supports THW-P4.	Retain THW-P4 (Three waters infrastructure servicing) as notified.	Accept	No
Fire and Emergency New Zealand	273.23	Energy Infrastructure and Transport / Three Waters / THW-P4	Support in part	Supports the policy as it requires all new subdivision or development in urban areas to be serviced by Three Waters infrastructure which meets the Wellington Water Regional Standard for Water Services, which makes references to the FENZ Code of Practice, has sufficient capacity to accommodate the development and is in place prior to the commencement of construction. FENZ is concerned regarding the development of new building hydrant systems being considered an alternative option to the requirement of standard infrastructure hydrant systems in the reticulated area. FENZ notes these systems are not maintained or designed to the level of standard hydrant systems and wishes to add explanatory text highlighting to developers that building hydrant systems cannot be considered an alternative option for the purposes of this provision.	Supports THW-P4 (Three waters infrastructure servicing) with amendment.	Accept	No
Fire and Emergency New Zealand	273.24	Energy Infrastructure and Transport / Three Waters / THW-P4	Amend	Supports the policy as it requires all new subdivision or development in urban areas to be serviced by Three Waters infrastructure which meets the Wellington Water Regional Standard for Water Services, which makes references to the FENZ Code of Practice, has sufficient capacity to accommodate the development and is in place prior to the commencement of construction. FENZ is concerned regarding the development of new building hydrant systems being considered an alternative option to the requirement of standard infrastructure hydrant systems in the reticulated area. FENZ notes these systems are not maintained or designed to the level of standard hydrant systems and wishes to add explanatory text highlighting to developers that building hydrant systems cannot be considered an alternative option for the purposes of this provision.	Amend THW-P4 (Three waters infrastructure servicing) as follows: <u>Note: Building hydrant systems cannot be considered a replacement of standard infrastructure hydrant systems.</u>	Reject	No
Claire Nolan, James Fraser, Biddy Bunzl, Margaret Franken, Michelle Wolland, and Lee Muir	275.11	Energy Infrastructure and Transport / Three Waters / THW-P4	Support	Supports the policy THW-P4: Limit subdivision and development in urban areas where existing three waters capacity and/or level of service is insufficient to service further development.	Retain THW-P4 (Three Waters infrastructure servicing) as notified.	Accept	No

Heidi Snelson, Aman Hunt, Chia Hunt, Ela Hunt	276.10	Energy Infrastructure and Transport / Three Waters / THW-P4	Not specified	<p>Considers that "Well functioning urban environment" does not apply to THW-P4 because it does not comply with points d, f & g in the definition of "Well functioning urban environment" within the PDP.</p> <p>There is no link road from the development site to Churton Park, Glenside or Tawa has been planned.</p> <p>Development area is an isolated area on steep, hilly terrain.</p> <p>The access road from Westchester Drive is flood prone.</p> <p>West Glenside at 395 Middleton Road will not be Climate Change Sustainable and Natural Hazard Resilient.</p> <p>[Refer to original submission for full reason]</p>	Not specified.	Reject	No
Rimu Architects Ltd	318.15	Energy Infrastructure and Transport / Three Waters / THW-P4	Amend	<p>Considers that THW-P4 omits any mention of planned enhancements to bring the 3 waters infrastructure to a level that is adequate for Medium and High Density residential zones (e.g. by deferring some areas for 5 or 10 years until the required infrastructure is constructed) or even a programme of renewals to bring capacity up service permitted uses under the operative district plan.</p>	Amend THW-P4 (Three waters infrastructure servicing) to add a statement on upgrading infrastructure to meet the level of service required to meet the requirements of permitted uses.	Reject	No
Retirement Villages Association of New Zealand Incorporated	350.33	Energy Infrastructure and Transport / Three Waters / THW-P4	Support in part	<p>Considers that these policies overlap creating interpretation issues. Supports provision for development where there is sufficient existing or planned infrastructure capacity or alternative servicing is available.</p>	Retain THW-P4 (Three waters infrastructure servicing) and seeks amendment to remove overlap within THW-P3 (Infrastructure-enabled urban development) and ensure the policies provide for alternative servicing where there is not existing/planned capacity.	Reject	No
Retirement Villages Association of New Zealand Incorporated	350.34	Energy Infrastructure and Transport / Three Waters / THW-P4	Amend	<p>Considers that these policies overlap creating interpretation issues. Supports provision for development where there is sufficient existing or planned infrastructure capacity or alternative servicing is available.</p>	Seeks amendment to THW-P4 (Three waters infrastructure servicing) to remove overlap within THW-P3 (Infrastructure-enabled urban development) and ensure the policies provide for alternative servicing where there is not existing/planned capacity.	Reject	No
Greater Wellington Regional Council	351.86	Energy Infrastructure and Transport / Three Waters / THW-P4	Support in part	<p>Supports the need for sufficient infrastructure capacity prior to development, and this direction aligns with the Operative RPS.</p>	Retain provision, subject to amendments, as outlined other submission points.	Accept	No
WCC Environmental Reference Group	377.31	Energy Infrastructure and Transport / Three Waters / THW-P4	Amend	<p>THW-P4 is supported for its intent. Notes that the wording 'in urban areas' is not clear as to where the Policy applies and what is meant by urban areas. Concerned that the policy therefore will not apply outside of urban areas.</p>	<p>Amend THW-P4 (Three waters infrastructure servicing) as follows:</p> <p>Subdivision or development in urban areas is serviced by three waters infrastructure that:</p> <ol style="list-style-type: none"> 1. Meets the Wellington Water Regional Standard for Water Services v3.0 December 2021; 2. Has sufficient capacity to accommodate the development; and 3. Is in position prior to the commencement of construction. <p>Limit subdivision and development in urban areas where existing three waters capacity and/or level of service is insufficient to service further development unless: ...</p>	Reject	No
Kāinga Ora Homes and Communities	391.100	Energy Infrastructure and Transport / Three Waters / THW-P4	Support in part	<p>THW-P4 is generally supported, as it recognises and provides for alternative means servicing development where existing infrastructure is at capacity. An amendment is sought.</p>	Retain THW-P4 (Three waters infrastructure servicing) with amendment.	Accept	No
Kāinga Ora Homes and Communities	391.101	Energy Infrastructure and Transport / Three Waters / THW-P4	Amend	<p>Considers that THW-P4 should be amended, as it fails to recognise that development in urban areas may necessitate additional public investment in expansion of the three waters infrastructure. The appropriate response to this issue is to increase public investment where needed rather than to constrain otherwise appropriate development. The policy should recognise that development in urban areas may necessitate additional public investment in expansion of the three waters infrastructure.</p>	<p>Amend THW-P4 (Three waters infrastructure servicing) as follows:</p> <p>... Limit Provide for subdivision and development in urban areas where existing three waters capacity and/or level of service is insufficient to service further development, including and:</p> <ol style="list-style-type: none"> 1. It can be demonstrated there is an alternative solution to avoid or mitigate any adverse effects on the three waters infrastructure network and the health and wellbeing of water bodies and freshwater ecosystems. and or 2. Additional public investment in three waters infrastructure is appropriate and possible to enable the planned urban built form of the underlying zone and achieve a compact urban form. The additional demand generated will not necessitate additional unplanned public investment in, or expansion of, the three waters infrastructure network or compromise its ability to service other activities permitted within the zone. 	Reject	No

Generation Zero	FS54.7	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-P4	Support	Support proposed amendment to THW-04 to note that “increase public investment where needed rather than to constrain otherwise appropriate development” and further submit that: Poor infrastructure should not constrain development; Rather, it should be a signal for increased public investment; With appropriate cost recovery from new and existing users, infrastructure renewal and increasing of capacity should be cost neutral to water providers ; Historic underinvestment in infrastructure to keep rates artificially low should not be a reason to stop new development; More residential development can spread the high fixed cost of public infrastructure thus making its average cost more affordable for all.	Allow / Seeks that THW-04 is amended to note that "increase public investment where needed rather than constrain otherwise appropriate development".	Reject	No
Stride Investment Management Limited	FS107.40	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-P4	Support	Stride supports recognising that intensification of existing urban areas provides benefits and it is appropriate to provide for additional public investment in three waters infrastructure to enable intensification.	Allow	Reject	No
Investore Property Limited	FS108.40	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-P4	Support	Investore supports recognising that intensification of existing urban areas provides benefits and it is appropriate to provide for additional public investment in three waters infrastructure to enable intensification.	Allow	Reject	No
Survey & Spatial New Zealand Wellington Branch	439.14	Energy Infrastructure and Transport / Three Waters / THW-P4	Amend	Considers this policy to be contrary to the NPS-UD Policy 2, as it seeks to limit development unless there is sufficient infrastructure capacity of an alternative solution. Considers this is contrary particularly in regard to Council's responsibility to ensure sufficient development capacity for the short term.	Amend THW-P4 (Three water infrastructure servicing) to: Subdivision or development in urban areas is serviced by three waters infrastructure that: 1. Meets the Wellington Water Regional Standard for Water Services v3.0 December 2021; 2. Has sufficient capacity to accommodate the development; and 3. Is in position prior to the commencement of construction. Limit For subdivision and development in urban areas where existing three waters capacity and/or level of service is insufficient to service further development <u>unless ensure:</u> 1. It can be demonstrated there is an alternative solution to avoid or mitigate any adverse effects on the three waters infrastructure network and the health and wellbeing of water bodies and freshwater ecosystems; and 2. The additional demand generated will not necessitate additional unplanned public investment in, or expansion of, the three waters infrastructure network or compromise its ability to service other activities permitted within the zone.	Reject	No
The Thorndon Society Inc	487.3	Energy Infrastructure and Transport / Three Waters / THW-P4	Amend	Considers that in THW-P4, “Limit subdivision and development in urban areas where existing three waters capacity and/or level of service is insufficient to service further development:” should be changed. If the greatest urban space for further housing is Karori then capacity should be changed there to enable the capacity to be realised.	Amend THW-P4 (Three waters infrastructure servicing) to replace “ Limit subdivision and development in urban areas where existing three waters capacity and/or level of service is insufficient to service further development: ” with “ <u>Where existing three waters capacity and/or level of service is insufficient to service further development then look at means of increasing capacity to enable subdivision and development in urban areas.</u> ”	Reject	No
Thorndon Residents' Association Inc	FS69.85	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-P4	Support	Break down housing demand figures Infrastructure capacity insufficient – limit development Construction of buildings for business purposes should not be permitted in a residential area.	Allow	Reject	No
Historic Places Wellington Inc	FS111.76	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-P4	Support	No specific reason provided.	Allow	Reject	No
Rod Halliday	25.19	Energy Infrastructure and Transport / Three Waters / THW-P5	Amend	Considers that THW-P5 does not recognise that there are some parts of the City that drain to the Stebbings Dam and Seton Nossiter Detention Structures which are intended to hold back/throttle flows from a modelled 100 year event. In Stebbings Valley this has been modelled as the RL92 and there are easements over private property to protect this ponding area and keep it free of buildings for the 100 year event. The GWRC designation W4 (Operative Plan) and WRC6 (Proposed Plan) also reflect this purpose for Stebbings and similar designations are in place in the operative (W2) and proposed plans (WRC2) for Seton Nossiter. Previous developments in these catchments, including Churton Park subdivisions over the last 5+ years, have had no requirement for stormwater neutrality.	Seeks that THW-P5 (Hydraulic neutrality) is amended to note that some areas of the City can achieve the intent of this policy due to the presence of the Stebbings Dam and Seton Nossiter Detention Structures.	Reject	No

Glenside Progressive Association (GPA)	FS4.1	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-P5	Oppose	<p>Submitter states that Rule R5 requiring hydrological neutrality for any new housing development should not apply to the Upper Stebbings Valley or Seton Nossiter catchments because both these catchments are protected by detention dams. Submitter argues that previous developments in these catchments, including Churton Park subdivisions over the last 5+ years, have had no requirement for stormwater neutrality - however climate change is accelerating and what was required in the past must change to reduce future negative flood impacts.</p> <p>Serious flooding has occurred in the past from these catchments including some events after the detention dams were constructed. Stebbings detention dam was completed in 1994 and is designed to hold back water arising from a one on one-hundred-year flood event, a target that is now unlikely to be met due to the accelerating effects of climate change.</p> <p>Furthermore, Glenside West catchment is not in the Stebbings Dam or Seton Nossiter catchment and there is no downstream floodwater protection therefore Council should be taking additional measure to reduce the impact of earthworks and housing development on the Glenside West water catchment.</p>	<p>Disallow / Seeks:</p> <ul style="list-style-type: none"> - Acknowledgement by Council that the Government's Policy Statement on Urban Development does not apply to areas such as Glenside West. - That any development in Glenside West takes place with a minimum of earthworks and that natural gullies are not filled in. - That the grey unbuilt area in Glenside West is unsuitable land for housing and that the whole area shown in mustard/yellow (Fig 1) is limited to Large Lot Residential. - Roading and housing doesn't extend into gullies, ephemeral streams, intermittent and perennial streams and is kept away from the ridgetop. - Furthermore no housing is built above the current Glenside-Churton park suburb boundary in order that the ridgeline is offered at least some degree of visual protection. - Significant Natural Areas (SNAs) on this site must be preserved and not impacted by development, if any development is to take place 	Accept	No
Heidi Snelson	FS24.5	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-P5	Oppose	<p>Submitter is seeking to reduce mitigation requirements and responsibilities around hydraulic neutrality and permeable surface requirements in the case of storm water management at a unprecedented time of storm water damage in Wellington.</p> <p>Developments should undertake more mitigation not less in all areas given climate change. Especially those posing more risk, such as steep hillsides, abutting/above key infrastructure (roading, power, water, railway), and significant streams, such as at the sites of the current and planned developments in Churton Park and Glenside West.</p> <p>The Glenside West development area is downstream of both detention structures, on extremely steep hillsides, above Porirua Stream, directly above Middleton Road (State Highway 1 motorway detour route) and the North Island railway line (which runs alongside and over the Porirua Stream). This development area must be specifically required to achieve Hydraulic Neutrality. Be that through specific technological infrastructure in build design and water catchment, significant permeable surface requirements/planting. Through Large Lot Residential Only in Glenside West.</p>	<p>Disallow / Seeks that submission be disallowed to ensure strict adherence to hydraulic neutrality in Glenside West Development Area, and Stebbings Valley / Reedy Block Development Area. Seeks minimum standard of hydraulic neutrality required and corresponding requirement of high level of permeable surface mitigations.</p> <p>Seeks that Glenside West be designated Large Lot Residential only.</p>	Accept	No
Trelissick Park Group	168.6	Energy Infrastructure and Transport / Three Waters / THW-P5	Support	Supports that THW-P5 (Hydraulic neutrality) covers stormwater hydraulic neutrality and water sensitive design.	Retain THW-P5 (Hydraulic neutrality) as notified.	Accept	No
Tyers Stream Group	221.18	Energy Infrastructure and Transport / Three Waters / THW-P5	Support	Supports THW-P5.	Retain THW-P5 (Hydraulic neutrality) as notified.	Accept	No
Stratum Management Limited	249.5	Energy Infrastructure and Transport / Three Waters / THW-P5	Oppose	Considers that the policy states: "Require new subdivision and development to be designed, constructed and maintained to sustainably manage the volume and rate of discharge of stormwater to the receiving environment so that the rate of offsite stormwater discharge is reduced as far as practicable to be at or below the modelled peak flow and volume for each site in an undeveloped state." This approach ignores the existing environment and requires stormwater to be attenuated to account for a site in an undeveloped state. This brings with it additional costs in respect pf the required modelling, increased costs in attaining the attenuation required, and represents a significant departure from existing practice.	Amend THW-P5 (Hydraulic neutrality) to apply in situations of insufficient infrastructure capacity.	Reject	No
Stratum Management Limited	249.6	Energy Infrastructure and Transport / Three Waters / THW-P5	Oppose	Considers that the policy states: "Require new subdivision and development to be designed, constructed and maintained to sustainably manage the volume and rate of discharge of stormwater to the receiving environment so that the rate of offsite stormwater discharge is reduced as far as practicable to be at or below the modelled peak flow and volume for each site in an undeveloped state." This approach ignores the existing environment and requires stormwater to be attenuated to account for a site in an undeveloped state. This brings with it additional costs in respect pf the required modelling, increased costs in attaining the attenuation required, and represents a significant departure from existing practice.	Amend THW-P5 (Hydraulic neutrality) to continue to recognise the existing environment.	Accept in part	Yes
Stratum Management Limited	249.7	Energy Infrastructure and Transport / Three Waters / THW-P5	Oppose	Considers that the policy states: "Require new subdivision and development to be designed, constructed and maintained to sustainably manage the volume and rate of discharge of stormwater to the receiving environment so that the rate of offsite stormwater discharge is reduced as far as practicable to be at or below the modelled peak flow and volume for each site in an undeveloped state." This approach ignores the existing environment and requires stormwater to be attenuated to account for a site in an undeveloped state. This brings with it additional costs in respect pf the required modelling, increased costs in attaining the attenuation required, and represents a significant departure from existing practice.	Amend THW-P5 (Hydraulic neutrality) to exclude the City Centre Zone.	Accept	Yes

Heidi Snelson, Aman Hunt, Chia Hunt, Ela Hunt	276.11	Energy Infrastructure and Transport / Three Waters / THW-P5	Not specified	<p>Considers that "Well functioning urban environment" does not apply to THW-P5 because it does not comply with points d, f & g in the definition of "Well functioning urban environment" within the PDP.</p> <p>There is no link road from the development site to Churton Park, Glenside or Tawa has been planned.</p> <p>Development area is an isolated area on steep, hilly terrain.</p> <p>The access road from Westchester Drive is flood prone.</p> <p>West Glenside at 395 Middleton Road will not be Climate Change Sustainable and Natural Hazard Resilient.</p> <p>[Refer to original submission for full reason]</p>	Not specified.	Reject	No
Phillippa O'Connor	289.6	Energy Infrastructure and Transport / Three Waters / THW-P5	Amend	Considers that 'undeveloped state' is too onerous. Identifies that the assessment criteria for THW-R6.2 uses pre-development as a reference point and considers this more appropriate.	Amend THW-P5 (Hydraulic neutrality) as follows: Require new subdivision and development to be designed, constructed and maintained to sustainably manage the volume and rate of discharge of stormwater to the receiving environment so that the rate of offsite stormwater discharge is reduced as far as practicable to be at or below the modelled peak flow and volume for each site in an <u>undeveloped-pre-developed state</u> .	Accept in part	Yes
Retirement Villages Association of New Zealand Incorporated	350.35	Energy Infrastructure and Transport / Three Waters / THW-P5	Support in part	Supports the term "as far as practicable" in the policy, but considers that it remains unclear if hydraulic neutrality is required in all cases including where there is sufficient capacity in the downstream system and/or the effects of increased water flows can be managed effectively.	Retain THW-P5 (Hydraulic neutrality) and seeks amendment.	Accept	No
Retirement Villages Association of New Zealand Incorporated	350.36	Energy Infrastructure and Transport / Three Waters / THW-P5	Amend	Supports the term "as far as practicable" in the policy, but considers that it remains unclear if hydraulic neutrality is required in all cases including where there is sufficient capacity in the downstream system and/or the effects of increased water flows can be managed effectively.	Seeks amendment to THW-P5 (Hydraulic neutrality) so that hydraulic neutrality is not required (but encouraged) where there is sufficient capacity in the downstream system and/or the effects of increased water flows can be managed effectively.	Reject	No
Woolworths New Zealand	359.25	Energy Infrastructure and Transport / Three Waters / THW-P5	Amend	THW-P5 should be amended to remove reference to an 'undeveloped state' and replace with pre-developed state as the former is overly onerous. It is noted that the matters of discretion at Rule THW-R6.2 include an assessment against "the extent to which the development incorporates stormwater management techniques or controls to mitigate any increase in pre-development peak stormwater runoff" and as such it is considered that pre-development state is the appropriate baseline against which to assess effects in this regard.	Amend THW-P5 (Hydraulic neutrality) as follows: Require new subdivision and development to be designed, constructed and maintained to sustainably manage the volume and rate of discharge of stormwater to the receiving environment so that the rate of offsite stormwater discharge is reduced as far as practicable to be at or below the modelled peak flow and volume for each site in an <u>undeveloped state-pre-developed state</u> .	Accept in part	Yes
Stride Investment Management Limited	FS107.3	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-P5	Support	Stride supports this submission point for the reasons provided by the primary submitter.	Allow	Accept	Yes
Investore Property Limited	FS108.3	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-P5	Support	Investore supports this submission point for the reasons provided by the primary submitter.	Allow	Accept	Yes
WCC Environmental Reference Group	377.32	Energy Infrastructure and Transport / Three Waters / THW-P5	Support	THW-P5 is strongly supported. Considers hydraulic neutrality should be the baseline for all new development. Requiring this will help avoid increased risks from stormwater from new development as well as improving existing areas as they are developed. The Policy also gives effect to the NPS-FM.	Retain THW-P5 (Hydraulic Neutrality) as notified.	Accept	No
Michelle Rush	436.11	Energy Infrastructure and Transport / Three Waters / THW-P5	Support	THW-P5 is supported. Hydraulic neutrality should be the baseline for all new development of any scale. As urban areas densify, it is particularly important to require hydraulic neutrality to avoid increased stormwater risks from new development, as well as improve existing areas as they are re-developed. Finally, hydraulic neutrality will help contribute to keeping areas green and pleasant to be in, without excessive tracts of hard surfaces. This policy also supports the following sections of NPS-FM 2020: - Objective 2.1 (the Te Mana o Te Wai hierarchy) - Policy 3 - Policy 4 - Clause 3.5	Retain THW-P5 (Hydraulic neutrality) as notified.	Accept	No
Survey & Spatial New Zealand Wellington Branch	439.15	Energy Infrastructure and Transport / Three Waters / THW-P5	Amend	Considers hydraulic neutrality should refer to the current disposition of a site.	Amend THW-P5 (Hydraulic neutrality) to: Require new subdivision and development to be designed, constructed and maintained to sustainably manage the volume and rate of discharge of stormwater to the receiving environment so that the rate of offsite stormwater discharge is reduced as far as practicable to be at or below the modelled peak flow and volume for each site in <u>its current an undeveloped state</u> .	Accept	Yes
Trelissick Park Group	168.7	Energy Infrastructure and Transport / Three Waters / THW-R1	Support	Supports that THW-R1 (Connection to existing three waters infrastructure – new residential buildings) covers stormwater hydraulic neutrality and water sensitive design.	Retain THW-R1 (Connection to existing three waters infrastructure – new residential buildings) as notified, with amendments.	Accept	No

Trelissick Park Group	168.8	Energy Infrastructure and Transport / Three Waters / THW-R1	Amend	[No specific reason given beyond decision requested - refer to original submission].	Amend THW-R1.2 (Connection to existing three waters infrastructure – new residential buildings) as follows: 2. Activity status: Restricted Discretionary Where: a. Compliance with any of the requirements of THW-R1.1 for Wastewater and Water supply cannot be achieved. ...	Reject	No
Tyers Stream Group	221.19	Energy Infrastructure and Transport / Three Waters / THW-R1	Support in part	[No specific reason given beyond decision requested - refer to original submission]	Retain THW-R1 (Connection to existing three waters infrastructure – new residential buildings) with amendment.	Accept	No
Tyers Stream Group	221.20	Energy Infrastructure and Transport / Three Waters / THW-R1	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks amendment to THW-R1 (Connecting to existing three waters infrastructure - new residential buildings) to include compliance with the current status of the 3 waters infrastructure to be a permitted activity as per THW-R2 (Connection to existing three waters infrastructure – four or more residential units and non-residential development).	Accept	No
Fire and Emergency New Zealand	273.25	Energy Infrastructure and Transport / Three Waters / THW-R1	Support in part	Supports the rule as it permits new residential schemes, outside of the general rural and large lot residential zones, providing compliance is achieved with the level of service in Chapter 6, Tables 6.1 and 6.2 of the Wellington Water Regional Standard for Water Services v3.0 December 2021. While it is noted that the Wellington Water Regional Standard for Water Services includes references to the New Zealand Firefighting Water Supplies Code of Practice, FENZ considers it important for THW-R1 and THW-R2 to directly reference the Code of Practice to ensure firefighting water supply provisions are visible and enforceable through Three Waters Infrastructure provisions.	Support THW-R1 (Connection to existing three waters infrastructure – new residential buildings) with amendment.	Reject	No
Fire and Emergency New Zealand	273.26	Energy Infrastructure and Transport / Three Waters / THW-R1	Amend	Supports the rule as it permits new residential schemes, outside of the general rural and large lot residential zones, providing compliance is achieved with the level of service in Chapter 6, Tables 6.1 and 6.2 of the Wellington Water Regional Standard for Water Services v3.0 December 2021. While it is noted that the Wellington Water Regional Standard for Water Services includes references to the New Zealand Firefighting Water Supplies Code of Practice, FENZ considers it important for THW-R1 and THW-R2 to directly reference the Code of Practice to ensure firefighting water supply provisions are visible and enforceable through Three Waters Infrastructure provisions.	Amend THW-R1 (Connection to existing three waters infrastructure – new residential buildings) to include provision of a firefighting water supply in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008 within the permitted activity standards and matters of discretion.	Reject	No
Claire Nolan, James Fraser, Biddy Bunzl, Margaret Franken, Michelle Wolland, and Lee Muir	275.12	Energy Infrastructure and Transport / Three Waters / THW-R1	Oppose	Considers that what is permissible needs more current analysis (given climate change pressures) and should be more localised.	Opposes THW-R1 (Connection to existing three waters infrastructure) and seeks amendment.	Reject	No
WCC Environmental Reference Group	377.33	Energy Infrastructure and Transport / Three Waters / THW-R1	Support	THW-R1 is supported as it operationalises the relevant objectives and policies.	Retain THW-R1 (connection to existing three waters infrastructure - new residential buildings) as notified.	Accept	No
Survey & Spatial New Zealand Wellington Branch	439.16	Energy Infrastructure and Transport / Three Waters / THW-R1	Amend	Considers that this rule makes the Regional Standard for Water Services 2021 a permitted activity standard. Therefore considers that the document (or specific relevant provisions) should be incorporated into the Proposed District Plan to allow submissions on the provisions, rather than being incorporated as a reference document. Considers that the consultation requirements of Schedule 1, Clause 34 of the RMA have therefore not been met. Considers that incorporating material by reference creates uncertainty for developers, as these documents can be amended by other entities (specifically Wellington Water) with no particular process. Notes that while there was some consultation, few issues were resolved. Notes that a District Plan change would be required to incorporate any new variations to the Regional Standard for Water Services 2021.	Remove reference to the Regional Standard for Water Services Add minimum requirements for new connections into the District Plan as required by the Regional Standard for Water Services.	Reject	No
Trelissick Park Group	168.9	Energy Infrastructure and Transport / Three Waters / THW-R2	Support	Supports that THW-R2 (Connection to existing three waters infrastructure – four or more residential units and non-residential development) covers stormwater hydraulic neutrality and water sensitive design.	Retain THW-R2 (Connection to existing three waters infrastructure – four or more residential units and non-residential development) as notified, with amendments.	Accept	No

Trelissick Park Group	168.10	Energy Infrastructure and Transport / Three Waters / THW-R2	Amend	[No specific reason given beyond decision requested - refer to original submission].	Amend THW-R2.2 (Connection to existing three waters infrastructure – four or more residential units and non-residential development) as follows: 2. Activity status: Restricted Discretionary Where: a. Compliance with any of the requirements of THW-R2.1 for Wastewater and Water supply cannot be achieved. ...	Reject	No
Avryl Bramley	202.10	Energy Infrastructure and Transport / Three Waters / THW-R2	Amend	Considers that the Council may not retain ownership of water.	Amend THW-R2 (Connection to existing three waters) as follows: 1. Activity Status: Permitted Restricted Discretionary ...	Reject	No
Tyers Stream Group	221.21	Energy Infrastructure and Transport / Three Waters / THW-R2	Support in part	Supports the intent of the provision but is concerned that loose wording of matters of discretion such as 'site constraints' will mean that the intent will not be achieved given the prevalence of site constraints such as steep slopes across the city.	Not specified.	Reject	No
Fire and Emergency New Zealand	273.27	Energy Infrastructure and Transport / Three Waters / THW-R2	Support in part	Supports the rule as it permits new residential schemes, outside of the general rural and large lot residential zones, providing compliance is achieved with the level of service in Chapter 6, Tables 6.1 and 6.2 of the Wellington Water Regional Standard for Water Services v3.0 December 2021. While it is noted that the Wellington Water Regional Standard for Water Services includes references to the New Zealand Firefighting Water Supplies Code of Practice, FENZ considers it important for THW-R1 and THW-R2 to directly reference the Code of Practice to ensure firefighting water supply provisions are visible and enforceable through Three Waters Infrastructure provisions.	Support THW-R2 (Connection to existing three waters infrastructure – four or more residential units and non-residential development) with amendment.	Reject	No
Fire and Emergency New Zealand	273.28	Energy Infrastructure and Transport / Three Waters / THW-R2	Amend	Supports the rule as it permits new residential schemes, outside of the general rural and large lot residential zones, providing compliance is achieved with the level of service in Chapter 6, Tables 6.1 and 6.2 of the Wellington Water Regional Standard for Water Services v3.0 December 2021. While it is noted that the Wellington Water Regional Standard for Water Services includes references to the New Zealand Firefighting Water Supplies Code of Practice, FENZ considers it important for THW-R1 and THW-R2 to directly reference the Code of Practice to ensure firefighting water supply provisions are visible and enforceable through Three Waters Infrastructure provisions.	Amend THW-R2 (Connection to existing three waters infrastructure – four or more residential units and non-residential development) to include provision of a firefighting water supply in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008 within the permitted activity standards and matters of discretion.	Reject	No
Claire Nolan, James Fraser, Biddy Bunzl, Margaret Franken, Michelle Wolland, and Lee Muir	275.13	Energy Infrastructure and Transport / Three Waters / THW-R2	Oppose	Considers that what is permissible needs more current analysis (given climate change pressures) and should be more localised.	Opposes THW-R2 (Connection to existing three waters infrastructure) and seeks amendment.	Reject	No
Retirement Villages Association of New Zealand Incorporated	350.37	Energy Infrastructure and Transport / Three Waters / THW-R2	Support	Supports the inclusion of a rule that specifically provides for the connecting of multiunit housing, retirement villages, comprehensive development or non-residential buildings to existing three waters infrastructure as a permitted activity when all standards are met, or a restricted discretionary activity when they are not.	Retain THW-R2 (Connection to existing three waters infrastructure – four or more residential units and non-residential development) as notified.	Accept	No
WCC Environmental Reference Group	377.34	Energy Infrastructure and Transport / Three Waters / THW-R2	Support	THW-R2 is supported as it operationalises the relevant objectives and policies.	Retain THW-R2 (connection to existing three waters infrastructure - four or more residential units...) as notified.	Accept	No
Kāinga Ora Homes and Communities	391.102	Energy Infrastructure and Transport / Three Waters / THW-R2	Support	THW-R2 is generally supported.	Retain THW-R2 (Connection to existing three waters infrastructure...) as notified.	Accept	No
Survey & Spatial New Zealand Wellington Branch	439.17	Energy Infrastructure and Transport / Three Waters / THW-R2	Amend	Considers that this rule only permits multi-unit housing where there is three waters infrastructure capacity. Considers that demonstrating compliance with this is problematic, as Wellington Water holds infrastructure capacity information, and it can take some time for developers to receive this information from Wellington Water. Considers that this rule is contrary to the NPS-UD Policy 2, particularly regarding Council's responsibility to ensure sufficient development capacity in the short term.	Amend THW-R2 (Connection to existing three waters infrastructure – four or more residential units and non-residential development) to: a. It involves the construction of multi-unit housing, retirement villages, comprehensive development or a non-residential building; b. There is capacity within the relevant part of the three waters network; and c. Compliance with the following is achieved... Add minimum requirements for new connections into the District Plan as required by the Regional Standard for Water Services.	Reject	No
The Thorndon Society Inc	487.4	Energy Infrastructure and Transport / Three Waters / THW-R2	Oppose in part	Considers that in THW-R2.1 the construction of a non-residential building should not be permitted in a residential area if it is being built for business purposes.	Amend THW-R2.1 (Connection to existing three waters infrastructure – four or more residential units and non-residential development) as follows: 1. Activity status: Permitted Where: a. It involves the construction of multi-unit housing, retirement villages, comprehensive development or a non-residential building;	Reject	No

Thorndon Residents' Association Inc	FS69.86	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-R2	Support	Break down housing demand figures Infrastructure capacity insufficient – limit development Construction of buildings for business purposes should not be permitted in a residential area.	Allow	Reject	No
Historic Places Wellington Inc	FS111.77	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-R2	Support	No specific reason provided.	Allow	Reject	No
The Thorndon Society Inc	487.5	Energy Infrastructure and Transport / Three Waters / THW-R2	Amend	Considers that in THW-R2.1 the construction of a non-residential building should not be permitted in a residential area if it is being built for business purposes.	Amend THW-R2.1 (Connection to existing three waters infrastructure – four or more residential units and non-residential development) as follows: 1. Activity status: Permitted Where: a. It involves the construction of multi-unit housing, retirement villages, comprehensive development of a non-residential building;	Reject	No
Thorndon Residents' Association Inc	FS69.87	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-R2	Support	Break down housing demand figures Infrastructure capacity insufficient – limit development Construction of buildings for business purposes should not be permitted in a residential area.	Allow	Reject	No
Historic Places Wellington Inc	FS111.78	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-R2	Support	No specific reason provided.	Allow	Reject	No
Tyers Stream Group	221.22	Energy Infrastructure and Transport / Three Waters / THW-R3	Support in part	Supports the intent of the provision but is concerned that loose wording of matters of discretion such as 'site constraints' will mean that the intent will not be achieved given the prevalence of site constraints such as steep slopes across the city.	Not specified.	Reject	No
WCC Environmental Reference Group	377.35	Energy Infrastructure and Transport / Three Waters / THW-R3	Support	THW-R3 is supported as it operationalises the relevant objectives and policies.	Retain THW-R3 (copper and zinc building materials - all residential and non-residential development) as notified.	Accept	No
Trelissick Park Group	168.11	Energy Infrastructure and Transport / Three Waters / THW-R4	Support	Supports that THW-R4 (Incorporation of water sensitive design methods – four or more residential units and non-residential activity) covers stormwater hydraulic neutrality and water sensitive design.	Retain THW-R4 (Incorporation of water sensitive design methods – four or more residential units and non-residential activity) as notified, with amendments.	Accept	No
Trelissick Park Group	168.12	Energy Infrastructure and Transport / Three Waters / THW-R4	Amend	Considers that the restricted discretionary activity status of THW-R4 should be deleted. It is considered essential that all building developments, including infill housing, mandate at least neutral or lesser stormwater runoff, compared with pre-development.	Delete THW-R4.2 (Incorporation of water sensitive design methods – four or more residential units and non-residential activity) in its entirety.	Reject	No
Tyers Stream Group	221.23	Energy Infrastructure and Transport / Three Waters / THW-R4	Support in part	Supports the intent of the provision but is concerned that loose wording of matters of discretion such as 'site constraints' will mean that the intent will not be achieved given the prevalence of site constraints such as steep slopes across the city.	Not specified.	Reject	No
Stratum Management Limited	249.8	Energy Infrastructure and Transport / Three Waters / THW-R4	Oppose	Considers that any development of 4 or more units, or any non-residential building, will require resource consent under this rule as a restricted discretionary activity. The rule implements Policy THW-P1 (Water sensitive urban design) but is uncertain. There is no certainty as to what the rule, and underlying policy, are seeking to achieve. The rule references the Wellington Water Regional Standard for Water Services and associated design guidelines.	Remove THW-R4 (Incorporation of water sensitive design methods – four or more residential units and non-residential activity) in its entirety or amend the rule to exclude the City Centre Zone.	Reject	No
Stratum Management Limited	249.9	Energy Infrastructure and Transport / Three Waters / THW-R4	Amend	Considers that any development of 4 or more units, or any non-residential building, will require resource consent under this rule as a restricted discretionary activity. The rule implements Policy THW-P1 (Water sensitive urban design) but is uncertain. There is no certainty as to what the rule, and underlying policy, are seeking to achieve. The rule references the Wellington Water Regional Standard for Water Services and associated design guidelines.	Remove THW-R4 (Incorporation of water sensitive design methods – four or more residential units and non-residential activity) in its entirety or amend the rule to exclude the City Centre Zone.	Reject	No
Phillippa O'Connor	289.7	Energy Infrastructure and Transport / Three Waters / THW-R4	Oppose	Considers that the intent of THW-R4 can be managed through a permitted activity standard or controlled activity status instead of requiring a restricted discretionary resource consent.	Opposes the Restricted Discretionary activity status for rule THW-R4 (Incorporation of water sensitive design methods – four or more residential units and non-residential activity).	Reject	No
Phillippa O'Connor	289.8	Energy Infrastructure and Transport / Three Waters / THW-R4	Amend	Considers that the intent of THW-R4 can be managed through a permitted activity standard or controlled activity status instead of requiring a restricted discretionary resource consent.	Seeks that the activity status for THW-R4 (Incorporation of water sensitive design methods – four or more residential units and non-residential activity) is changed to permitted activity rule or controlled activity.	Reject	No
The Sustainability Society	339.5	Energy Infrastructure and Transport / Three Waters / THW-R4	Amend	Considers that design guidelines should address complexities with rainwater capture and storage and any required on-lot measures to prevent ongoing ecological impacts. Design Guidelines referenced in the Three Waters chapter for inner city development do not appropriately reflect the importance of design for realistic and robust stormwater management.	Seeks that Design Guidelines referenced in the 'Three Waters chapter' address complexities with rainwater capture and storage and any required on-lot measures to prevent ongoing ecological impacts.	Reject	No
Retirement Villages Association of New Zealand Incorporated	350.38	Energy Infrastructure and Transport / Three Waters / THW-R4	Oppose	Considers that the incorporation of water sensitive design methods in retirement villages the rule should not require new development to remedy existing issues (see submission on THW-P1). Considers that such methods should only be used to address the effects of the development and where they are the best practicable option. Notes that THW-R4 is only applicable to activities with 'four or more residential units and non-residential activity', with no equivalent rule provided / applicable to those activities that do not fall into this category.	Delete THW-R4 (Incorporation of water sensitive design methods – four or more residential units and non-residential activity) in its entirety as notified.	Reject	No

Greater Wellington Regional Council	351.87	Energy Infrastructure and Transport / Three Waters / THW-R4	Amend	Considers that the PDP should provide for approved alternative wastewater systems anywhere where there are constraints on the existing network capacity, as well as where connections are not available. Septic tanks are excluded from this recommendation due to their known issues with leakage of untreated wastewater and nitrates, particularly when poorly maintained.	Seeks to include direction in the Three Waters chapter to provide for decentralised wastewater re-use and treatment (of grey and black water) and disposal using alternative wastewater systems (but not septic tanks, due to their existing issues with contamination and leaching) anywhere where there are constraints on the existing network capacity, as well as where connections are not available. where connections are available and there is network capacity, a connection to the wastewater network would still be required.	Reject	No
The Retirement Villages Association of New Zealand Incorporated	FS126.60	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-R4	Support	The RVA supports the relief sought in this submission.	Allow	Reject	No
Ryman Healthcare Limited	FS128.60	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-R4	Support	Ryman supports the relief sought in this submission.	Allow	Reject	No
Woolworths New Zealand	359.26	Energy Infrastructure and Transport / Three Waters / THW-R4	Oppose	THW-R4 is opposed on the grounds that requiring restricted discretionary consent under rule THW-R4 for all non-residential developments introduces additional consenting requirements which could otherwise be dealt with via the introduction of a permitted activity standard, or a controlled activity consent framework. It is considered that this requirement could be more appropriately addressed by way of a permitted activity standard or controlled activity consent (noting that applications under THW-R4.1 are proposed to be considered without limited and public notification). It is considered that the intent of this rule could be incorporated into the provisions of THW-R6. [Refer to original submission for full reason]	Delete THW-R4 (incorporation of water sensitive design methods – four or more residential units and non-residential activity) in its entirety.	Reject	No
Stride Investment Management Limited	FS107.4	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-R4	Support	Stride supports this submission point for the reasons provided by the primary submitter.	Allow	Reject	No
Investore Property Limited	FS108.4	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-R4	Support	Investore supports this submission point for the reasons provided by the primary submitter.	Allow	Reject	No
WCC Environmental Reference Group	377.36	Energy Infrastructure and Transport / Three Waters / THW-R4	Support	THW-R4 is supported as it operationalises the relevant objectives and policies.	Retain THW-R4 (incorporation of water sensitive urban design methods...) as notified.	Accept	No
Survey & Spatial New Zealand Wellington Branch	439.18	Energy Infrastructure and Transport / Three Waters / THW-R4	Amend	Considers that the requirement to incorporate water sensitive design is not necessary for developments of up to three dwellings. Considers that the rule as currently stated makes all multi-unit developments an RD activity to enable Council to require water sensitive design on all multi-unit developments. Considers that the rule requiring use of the Guideline is unsuitable because it is aimed at greenfield subdivisions rather than infill multi-unit development.	Amend the matters of discretion for THW-R4 (Incorporation of water sensitive design methods – four or more residential units and non-residential activity) to: Matters of discretion are: 1. The relevant sections of the Wellington Water Regional Standard for Water Services, v3.0, December 2021 and Wellington Water Limited's Water Sensitive Design for Stormwater Treatment Device Design Guideline December 2019; 2. Design, location, efficiency and effectiveness of water sensitive design methods; 3. Adoption of best practicable option for stormwater retention and treatment; 4. Ownership, maintenance and operation arrangements; and 5. Any site constraints	Reject	No
Rod Halliday	25.20	Energy Infrastructure and Transport / Three Waters / THW-R5	Amend	Considers that THW-P5 does not recognise that there are some parts of the City that drain to the Stebbings Dam and Seton Nossiter Detention Structures which are intended to hold back/throttle flows from a modelled 100 year event. In Stebbings Valley this has been modelled as the RL92 and there are easements over private property to protect this ponding area and keep it free of buildings for the 100 year event. The GWRC designation W4 (Operative Plan) and WRC6 (Proposed Plan) also reflect this purpose for Stebbings and similar designations are in place in the operative (W2) and proposed plans (WRC2) for Seton Nossiter. Previous developments in these catchments, including Churton Park subdivisions over the last 5+ years, have had no requirement for stormwater neutrality.	Seeks that THW-R5 (Hydraulic neutrality - 1-3 residential units) is amended to note or include an exemption that when 1-3 units are proposed in areas of the City situated within the catchments of the Stebbings and Seton Nossiter Detention structures, then THW-R5 will not apply.	Reject	No

Glenside Progressive Association (GPA)	FS4.2	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-R5	Oppose	<p>Submitter states that Rule R5 requiring hydrological neutrality for any new housing development should not apply to the Upper Stebbings Valley or Seton Nossiter catchments because both these catchments are protected by detention dams. Submitter argues that previous developments in these catchments, including Churton Park subdivisions over the last 5+ years, have had no requirement for stormwater neutrality - however climate change is accelerating and what was required in the past must change to reduce future negative flood impacts.</p> <p>Serious flooding has occurred in the past from these catchments including some events after the detention dams were constructed. Stebbings detention dam was completed in 1994 and is designed to hold back water arising from a one on one-hundred-year flood event, a target that is now unlikely to be met due to the accelerating effects of climate change.</p> <p>Furthermore, Glenside West catchment is not in the Stebbings Dam or Seton Nossiter catchment and there is no downstream floodwater protection therefore Council should be taking additional measure to reduce the impact of earthworks and housing development on the Glenside West water catchment.</p> <p>[Refer to further submission for full reason]</p>	<p>Disallow / Seeks:</p> <ul style="list-style-type: none"> - Acknowledgement by Council that the Government's Policy Statement on Urban Development does not apply to areas such as Glenside West. - That any development in Glenside West takes place with a minimum of earthworks and that natural gullies are not filled in. - That the grey unbuilt area in Glenside West is unsuitable land for housing and that the whole area shown in mustard/yellow (Fig 1) is limited to Large Lot Residential. - Roading and housing doesn't extend into gullies, ephemeral streams, intermittent and perennial streams and is kept away from the ridgetop. - Furthermore no housing is built above the current Glenside-Churton park suburb boundary in order that the ridgeline is offered at least some degree of visual protection. - Significant Natural Areas (SNAs) on this site must be preserved and not impacted by development, if any development is to take place 	Accept	No
Heidi Snelson	FS24.6	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-R5	Oppose	<p>Submitter is seeking to reduce mitigation requirements and responsibilities around hydraulic neutrality and permeable surface requirements in the case of storm water management at a unprecedented time of storm water damage in Wellington.</p> <p>Developments should undertake more mitigation not less in all areas given climate change. Especially those posing more risk, such as steep hillsides, abutting/above key infrastructure (roading, power, water, railway), and significant streams, such as at the sites of the current and planned developments in Churton Park and Glenside West.</p> <p>The Glenside West development area is downstream of both detention structures, on extremely steep hillsides, above Porirua Stream, directly above Middleton Road (State Highway 1 motorway detour route) and the North Island railway line (which runs alongside and over the Porirua Stream). This development area must be specifically required to achieve Hydraulic Neutrality. Be that through specific technological infrastructure in build design and water catchment, significant permeable surface requirements/planting. Through Large Lot Residential Only in Glenside West.</p>	<p>Disallow / Seeks that submission be disallowed to ensure strict adherence to hydraulic neutrality in Glenside West Development Area, and Stebbings Valley / Reedy Block Development Area. Seeks minimum standard of hydraulic neutrality required and corresponding requirement of high level of permeable surface mitigations.</p> <p>Seeks that Glenside West be designated Large Lot Residential only.</p>	Accept	No
Trelissick Park Group	168.13	Energy Infrastructure and Transport / Three Waters / THW-R5	Support	Supports that THW-R5 (Hydraulic neutrality – 1-3 residential units) covers stormwater hydraulic neutrality and water sensitive design.	Retain THW-R5 (Hydraulic neutrality – 1-3 residential units) as notified, with amendments below.	Accept	No
Trelissick Park Group	168.14	Energy Infrastructure and Transport / Three Waters / THW-R5	Amend	Considers that the restricted discretionary activity status of THW-R5 should be deleted. It is considered essential that all building developments, including infill housing, mandate at least neutral or lesser stormwater runoff, compared with pre-development.	Delete THW-R5.2 (Hydraulic neutrality – 1-3 residential units) in its entirety.	Reject	No
Wellington City Youth Council	201.26	Energy Infrastructure and Transport / Three Waters / THW-R5	Support	Supports hydraulic neutrality as a consideration in developments and thinks that this should inform a future-proof water management approach.	Retain THW-R5 (Hydraulic Neutrality for 1 - 3 residential units) as notified.	Accept	No
Tyers Stream Group	221.24	Energy Infrastructure and Transport / Three Waters / THW-R5	Support in part	Supports the intent of the provision but is concerned that loose wording of matters of discretion such as 'site constraints' will mean that the intent will not be achieved given the prevalence of site constraints such as steep slopes across the city.	Not specified.	Reject	No
Tyers Stream Group	221.25	Energy Infrastructure and Transport / Three Waters / THW-R5	Amend	<p>Considers that it is unclear whether these standards apply to both the short-term site development and the subsequent long-term effects of that development.</p> <p>Considers that both matters need to be addressed if there is to be significant suburban intensification.</p>	Seeks that the rule be clarified that it applies on an ongoing basis.	Reject	No
Stratum Management Limited	249.10	Energy Infrastructure and Transport / Three Waters / THW-R5	Oppose	Considers that this rule requires that a "Wellington Water Limited approved solution" is implemented to achieve hydraulic neutrality for 1-3 units. A Wellington Water approved solution is open to ongoing change, therefore creating uncertainty.	Remove THW-R5 (Hydraulic neutrality - 1-3 units) in its entirety or re-draft the rule to provide appropriate certainty, including limiting the requirement to apply only where existing infrastructure is under-capacity.	Reject	No
Stratum Management Limited	249.11	Energy Infrastructure and Transport / Three Waters / THW-R5	Amend	Considers that this rule requires that a "Wellington Water Limited approved solution" is implemented to achieve hydraulic neutrality for 1-3 units. A Wellington Water approved solution is open to ongoing change, therefore creating uncertainty.	Remove THW-R5 (Hydraulic neutrality - 1-3 units) in its entirety or re-draft the rule to provide appropriate certainty, including limiting the requirement to apply only where existing infrastructure is under-capacity.	Reject	No
WCC Environmental Reference Group	377.37	Energy Infrastructure and Transport / Three Waters / THW-R5	Support	THW-R5 is supported as it operationalises the relevant objectives and policies.	Retain THW-R5 (Hydraulic neutrality...) as notified.	Accept	No

Survey & Spatial New Zealand Wellington Branch	439.19	Energy Infrastructure and Transport / Three Waters / THW-R5	Amend	Considers that a Permitted activity status should not be limited to two pre-approved detention systems, and that there are other solutions available that should be permitted.	Amend THW-R5 (Hydraulic neutrality – 1-3 residential units) to: 1. Activity status: Permitted Where: a. It involves the construction of 1-3 residential units; and b. A Wellington Water Limited approved solution for managing volume and rate of stormwater runoff is installed as part of the development; or c. <u>Stormwater management measures are incorporated which achieve post development peak stormwater flows and volumes which are the same or less than the modelled peak flows and volumes for the site in its current state.</u>	Reject	No
Rod Halliday	25.21	Energy Infrastructure and Transport / Three Waters / THW-R6	Amend	Considers that THW-P5 does not recognise that there are some parts of the City that drain to the Stebbings Dam and Seton Nossiter Detention Structures which are intended to hold back/throttle flows from a modelled 100 year event. In Stebbings Valley this has been modelled as the RL92 and there are easements over private property to protect this ponding area and keep it free of buildings for the 100 year event. The GWRC designation W4 (Operative Plan) and WRC6 (Proposed Plan) also reflect this purpose for Stebbings and similar designations are in place in the operative (W2) and proposed plans (WRC2) for Seton Nossiter. Previous developments in these catchments, including Churton Park subdivisions over the last 5+ years, have had no requirement for stormwater neutrality.	Seeks that THW-R6 (Hydraulic neutrality - four or more residential units and non-residential buildings) is amended to note or include an exemption that when three or more units are proposed in areas of the City situated within the natural catchments of the Stebbings and Seton Nossiter Detention structures, then THW-R6 will not apply.	Reject	No
Glenside Progressive Association (GPA)	FS4.3	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-R6	Oppose	Submitter states that Rule R5 requiring hydrological neutrality for any new housing development should not apply to the Upper Stebbings Valley or Seton Nossiter catchments because both these catchments are protected by detention dams. Submitter argues that previous developments in these catchments, including Churton Park subdivisions over the last 5+ years, have had no requirement for stormwater neutrality - however climate change is accelerating and what was required in the past must change to reduce future negative flood impacts. Serious flooding has occurred in the past from these catchments including some events after the detention dams were constructed. Stebbings detention dam was completed in 1994 and is designed to hold back water arising from a one on one-hundred-year flood event, a target that is now unlikely to be met due to the accelerating effects of climate change. Furthermore, Glenside West catchment is not in the Stebbings Dam or Seton Nossiter catchment and there is no downstream floodwater protection therefore Council should be taking additional measure to reduce the impact of earthworks and housing development on the Glenside West water catchment. [Refer to further submission for full reason]	Disallow / Seeks: - Acknowledgement by Council that the Government's Policy Statement on Urban Development does not apply to areas such as Glenside West. - That any development in Glenside West takes place with a minimum of earthworks and that natural gullies are not filled in. - That the grey unbuilt area in Glenside West is unsuitable land for housing and that the whole area shown in mustard/yellow (Fig 1) is limited to Large Lot Residential. - Roading and housing doesn't extend into gullies, ephemeral streams, intermittent and perennial streams and is kept away from the ridgetop. - Furthermore no housing is built above the current Glenside-Churton park suburb boundary in order that the ridgeline is offered at least some degree of visual protection. - Significant Natural Areas (SNAs) on this site must be preserved and not impacted by development, if any development is to take place	Accept	No
Heidi Snelson	FS24.7	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-R6	Oppose	Submitter is seeking to reduce mitigation requirements and responsibilities around hydraulic neutrality and permeable surface requirements in the case of storm water management at a unprecedented time of storm water damage in Wellington. Developments should undertake more mitigation not less in all areas given climate change. Especially those posing more risk, such as steep hillsides, abutting/above key infrastructure (roading, power, water, railway), and significant streams, such as at the sites of the current and planned developments in Churton Park and Glenside West. The Glenside West development area is downstream of both detention structures, on extremely steep hillsides, above Porirua Stream, directly above Middleton Road (State Highway 1 motorway detour route) and the North Island railway line (which runs alongside and over the Porirua Stream). This development area must be specifically required to achieve Hydraulic Neutrality. Be that through specific technological infrastructure in build design and water catchment, significant permeable surface requirements/planting. Through Large Lot Residential Only in Glenside West.	Disallow / Seeks that submission be disallowed to ensure strict adherence to hydraulic neutrality in Glenside West Development Area, and Stebbings Valley / Reedy Block Development Area. Seeks minimum standard of hydraulic neutrality required and corresponding requirement of high level of permeable surface mitigations. Seeks that Glenside West be designated Large Lot Residential only.	Accept	No
Trelissick Park Group	168.15	Energy Infrastructure and Transport / Three Waters / THW-R6	Support	Supports that THW-R6 (Hydraulic neutrality – four or more residential units and non-residential buildings) covers stormwater hydraulic neutrality and water sensitive design.	Retain THW-R6 (Hydraulic neutrality – four or more residential units and non-residential buildings) as notified, with amendments below.	Accept	No
Trelissick Park Group	168.16	Energy Infrastructure and Transport / Three Waters / THW-R6	Amend	Considers that the restricted discretionary activity status of THW-R6 should be deleted. It is considered essential that all building developments, including infill housing, mandate at least neutral or lesser stormwater runoff, compared with pre-development.	Amend THW-R6.2 (Hydraulic neutrality – four or more residential units and non-residential buildings) in its entirety.	Reject	No
Wellington City Youth Council	201.27	Energy Infrastructure and Transport / Three Waters / THW-R6	Support	Supports hydraulic neutrality as a consideration in developments and thinks that this should inform a future-proof water management approach.	Retain THW-R6 (Hydraulic Neutrality for 4+ residential units) as notified.	Accept	No

Tyers Stream Group	221.26	Energy Infrastructure and Transport / Three Waters / THW-R6	Amend	Considers that it is unclear whether these standards apply to both the short-term site development and the subsequent long-term effects of that development. Considers that both matters need to be addressed if there is to be significant suburban intensification.	Seeks that the rule be clarified that it applies on an ongoing basis.	Accept in part	No
Stratum Management Limited	249.12	Energy Infrastructure and Transport / Three Waters / THW-R6	Oppose	Considers that the rule requires developments of 4 or more units to incorporate stormwater management measures that achieve post development peak stormwater flows and volumes that are the same or less than the modelled peak flows and volumes for the site in an undeveloped state. The rule relates to policy THW-P5 (Hydraulic neutrality) outlined above.	Remove THW-R6 (Hydraulic neutrality - 4+ units) in its entirety or amend the rule to exclude the City Centre Zone.	Accept in part	Yes
Stratum Management Limited	249.13	Energy Infrastructure and Transport / Three Waters / THW-R6	Amend	Considers that the rule requires developments of 4 or more units to incorporate stormwater management measures that achieve post development peak stormwater flows and volumes that are the same or less than the modelled peak flows and volumes for the site in an undeveloped state. The rule relates to policy THW-P5 (Hydraulic neutrality) outlined above.	Remove THW-R6 (Hydraulic neutrality - 4+ units) in its entirety or amend the rule to exclude the City Centre Zone.	Accept in part	Yes
Phillippa O'Connor	289.9	Energy Infrastructure and Transport / Three Waters / THW-R6	Amend	Considers that 'undeveloped state' is too onerous and considers that the 'pre-developed' state more appropriate of a level of hydraulic neutrality to achieve.	Amend THW-R6 (Hydraulic neutrality – four or more residential units and non-residential buildings) as follows: 1. Activity status: Permitted Where: a. It involves the construction of multi-unit housing, retirement villages, comprehensive development or a non-residential building; and b. Stormwater management measures are incorporated which achieve post development peak stormwater flows and volumes which are the same or less than the modelled peak flows and volumes for the site in an undeveloped state <u>pre-developed state</u> . Note: Guidance for calculating peak stormwater flows and volumes is contained in the Wellington Water Quick Reference Guide for Design Storm Hydrology; Standardised Parameters for Hydrological Modelling, April 2019. Guidance on which storm events are to be managed is contained in Chapter 4 of the Wellington Water Regional Standard for Water Services v3.0 December 2021.	Accept in part	Yes
Phillippa O'Connor	289.10	Energy Infrastructure and Transport / Three Waters / THW-R6	Support	Supports notification preclusions for THW-R6.2	Retain the notification preclusions for rule THW-R6.2 (Hydraulic neutrality – four or more residential units and non-residential buildings) as notified.	Accept	No
Retirement Villages Association of New Zealand Incorporated	350.39	Energy Infrastructure and Transport / Three Waters / THW-R6	Support	Supports the inclusion of a rule that specifically provides for hydraulic neutrality in association with the construction of multi-unit housing, retirement villages, comprehensive development and non-residential buildings as a permitted activity, and restricted discretionary where standards are not met.	Retain THW-R6 (Hydraulic neutrality – four or more residential units and non-residential buildings) as notified.	Accept	No
Woolworths New Zealand	359.27	Energy Infrastructure and Transport / Three Waters / THW-R6	Support in part	Supports the inclusion of the preclusion of notification of applications made in respect of rule THW-R6.2.	Retain THW-R6 (Hydraulic neutrality – four or more residential units and non-residential buildings) with amendment.	Accept	No

Stride Investment Management Limited	FS107.5	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-R6	Support	Stride supports this submission point for the reasons provided by the primary submitter.	Allow	Accept	No
Investore Property Limited	FS108.5	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-R6	Support	Investore supports this submission point for the reasons provided by the primary submitter.	Allow	Accept	No
Woolworths New Zealand	359.28	Energy Infrastructure and Transport / Three Waters / THW-R6	Amend	Considers that THW-R6 should be amended to replace 'undeveloped state' with 'pre-developed state' as this the former is overly onerous. The proposed reference within the hydraulic neutrality requirements (THW-R6) to demonstrate that stormwater flows are the same or less than the site in an "undeveloped state" is too onerous and instead the threshold should instead be compared against a pre-developed state. This amendment ensures consistency in the baseline that is applied between the permitted activity standard and the restricted discretionary activity.	Amend THW-R6 (Hydraulic neutrality – four or more residential units and non-residential buildings) as follows: 1. Activity status: Permitted Where: a. It involves the construction of multi-unit housing, retirement villages, comprehensive development or a non-residential building; and b. Stormwater management measures are incorporated which achieve post development peak stormwater flows and volumes which are the same or less than the modelled peak flows and volumes for the site in an undeveloped state <u>pre-developed state</u> .	Accept in part	Yes
Stride Investment Management Limited	FS107.6	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-R6	Support	Stride supports this submission point for the reasons provided by the primary submitter.	Allow	Accept	Yes
Investore Property Limited	FS108.6	Part 2 / Energy Infrastructure and Transport / Three Waters / THW-R6	Support	Investore supports this submission point for the reasons provided by the primary submitter.	Allow	Accept	Yes
Survey & Spatial New Zealand Wellington Branch	439.20	Energy Infrastructure and Transport / Three Waters / THW-R6	Amend	Considers hydraulic neutrality should refer to the current disposition of a site.	Amend THW-R6 (Hydraulic neutrality – four or more residential units and non-residential buildings) to: 1. Activity status: Permitted Where: a. It involves the construction of multi-unit housing, retirement villages, comprehensive development or a non-residential building; and b. Stormwater management measures are incorporated which achieve post development peak stormwater flows and volumes which are the same or less than the modelled peak flows and volumes for the site in <u>its current</u> an undeveloped state	Accept	Yes
Wellington City Council	266.49	Interpretation Subpart / Definitions / New definition	Amend	Considers that to provide greater clarification in relation to different types of wetlands – in particular to distinguish between "constructed wetland" and "natural wetland" a new definition should be added. A definition of Constructed Wetland provides for clarity regarding types of wetlands, as set out by National Institute of Water and Atmospheric Research.	Add new definition for 'constructed Wetland' as follows: <u>CONSTRUCTED WETLAND</u> <u>means an artificial wetland that can be designed for flood control in addition to be used for natural processes involving wetland vegetation, soils, and their associated microbial assemblages to treat domestic wastewater, industrial wastewater, greywater or stormwater runoff, to improve water quality.</u> Consequential amendments throughout the PDP to reference new definition.	Accept	Yes
Wellington City Council	266.50	Interpretation Subpart / Definitions / New definition	Amend	Considers that a new definition should be added for first flush to provide clarity in association with amendments to THW-P1. This definition is consistent with Auckland Council GD01.	Add a new definition for 'First Flush' as follows: <u>FIRST FLUSH</u> <u>means the initial surface runoff from a storm event. Initial runoff from highly impervious areas typically has high concentrations of pollutants compared to the remainder of the storm.</u>	Accept	Yes

Wellington City Council	266.52	Interpretation Subpart / Definitions / New definition	Amend	Considers it necessary to provide greater clarification in relation to different types of wetlands – in particular to distinguish between “constructed wetland” and “natural wetland”. This gives greater effect to the NPS-FM and NES-FM, and is consistent with Regional Policy Statements and plans.	Add a new definition for “Natural Wetland” as follows: <u>NATURAL WETLAND</u> has the same meaning as defined in the National Policy Statement for Freshwater Management 2020 means a wetland (as defined in the Act) that is not: (a) a wetland constructed by artificial means (unless it was constructed to offset impacts on, or restore, an existing or former natural wetland); or (b) a geothermal wetland; or (c) any area of improved pasture that, at the commencement date, is dominated by (that is more than 50% of) exotic pasture species and is subject to temporary rain derived water pooling. Consequential amendments throughout the PDP to reference new definition.	Accept	Yes
Greater Wellington Regional Council	FS84.1	Part 1 / Interpretation Subpart / Definitions / New definition	Support	Greater Wellington agree that the types of wetlands need to be distinguished in the Proposed District Plan and support the insertion of the natural wetlands definition from the NPS-FM. This relief would align with the Proposed Natural Resources Plan	Allow	Accept	Yes
Wellington City Council	266.53	Interpretation Subpart / Definitions / New definition	Amend	Considers clarification is needed around the meaning of ‘undeveloped state’ as used in the Three Waters chapter.	Seeks to clarify/add a new definition for ‘undeveloped site’ through collaboration with Greater Wellington Regional Council and Wellington Water.	Accept	Yes

Greater Wellington Regional Council	FS84.2	Part 1 / Interpretation Subpart / Definitions / New definition	Support	Greater Wellington agree that a new definition or greater clarity on the term “undeveloped state” would be beneficial.	Allow	Accept	Yes
Survey & Spatial New Zealand Wellington Branch	FS116.1	Part 1 / Interpretation Subpart / Definitions / New definition	Oppose	Rather than introduce a definition for “undeveloped state”, SSNZ Wellington prefer to delete the term “undeveloped state” from the definition of “hydraulic neutrality” and amend the definition of “hydraulic neutrality”	Disallow	Reject	No
The Sustainability Society	339.1	Interpretation Subpart / Definitions / New definition	Amend	Considers that a definition for “water sensitive design” should be provided. It is important to recognise that water sensitive design is largely based on a set of Principles that cover water quality, water quantity, integrated urban design and co-benefits. A comprehensive definition of what is meant by the term water sensitive design should be included.	Add a definition for “Water Sensitive Design”.	Reject	No
WCC Environmental Reference Group	377.6	Interpretation Subpart / Definitions / New definition	Amend	Considers that ‘Urban Areas’ is not defined.	Not specified.	Reject	No
Rimu Architects Ltd	318.11	Interpretation Subpart / Definitions / HYDRAULIC NEUTRALITY	Amend	Considers that the definition of ‘Hydraulic Neutrality’ should be amended. The proposed definition’s use of ‘site in an undeveloped state’ does not equate to the ‘pre-development’ used here except for greenfield sites. The rules relating to Hydraulic Neutrality, THW-R5 for up to 3 residential units and THW-R6 for 4 or more units, reference Wellington Water regional standards. Their Regional Standard for Water Services states in Section 4 Stormwater at 4.2.1 functionality (on page 29). (f) Retention or attenuation/detention facilities are required for all new development connecting to existing infrastructure and shall be designed to limit the design peak discharge from the development (post-construction) to not greater than the existing design peak discharge (pre-development) from the site for all events up to a 1% annual exceedance probability (AEP) event which shall include the predicted impacts of climate change. (i) Wellington Water has the right to nominate an alternative design event and event duration to mitigate specific downstream risks. The proposed definition’s use of ‘site in an undeveloped state’ does not equate to the ‘pre-development’ used here except for greenfield sites.	Amend the definition of ‘Hydraulic Neutrality’ as follows: means managing stormwater runoff from subdivision, use and development through either on-site disposal or storage, so that peak stormwater flows and volumes are released from the site at a rate that does not exceed the modelled peak flows from the site <u>in its existing an undeveloped state.</u>	Reject	No
Survey & Spatial New Zealand Wellington Branch	FS116.3	Part 1 / Interpretation Subpart / Definitions / HYDRAULIC NEUTRALITY	Support	The use of the term “undeveloped state” would suggest that the stormwater runoff from any existing buildings is to be ignored, and that the site be considered as though it was a vacant greenfield site. This definition is contradictory to the Regional Standard for water Services. The definition should refer to the site in its current state (at the time of an application for development).	Allow	Reject	No
Survey & Spatial New Zealand Wellington Branch	439.7	Interpretation Subpart / Definitions / HYDRAULIC NEUTRALITY	Amend	Considers that the definition as proposed removes the existing use rights for any building to discharge stormwater from a site, by way of requiring the rate of stormwater discharge to be the same as that of an undeveloped site.	Amend the definition of “hydraulic neutrality” to: Means managing stormwater runoff from subdivision, use and development through either on-site disposal or storage, so that peak stormwater flows and volumes are released from the site at a rate that does not exceed the modelled peak flows and volumes from the site at a rate that does not exceed the modelled peak flows and volumes from the site <u>in an undeveloped its existing state prior to subdivision, use or development.</u>	Reject	No
CentrePort Limited	402.28	Interpretation Subpart / Definitions / THREE WATER INFRASTRUCTURE	Support in part	Supports definition of ‘Three Water Infrastructure’ in part. CentrePort holds considerable land that also adjoins the Coastal Marine Area and has extensive network infrastructure within these landholdings. The agencies listed do not include CentrePort as being an agency responsible for three waters infrastructure.	Retain definition of ‘Three Waters Infrastructure’, with amendment.	Reject	No
CentrePort Limited	402.29	Interpretation Subpart / Definitions / THREE WATER INFRASTRUCTURE	Amend	CentrePort holds considerable land that also adjoins the Coastal Marine Area and has extensive network infrastructure within these landholdings. The agencies listed do not include CentrePort as being an agency responsible for three waters infrastructure.	Amend definition of ‘Three Waters Infrastructure’ as follows: means network infrastructure for water supply, wastewater, or stormwater, <u>to the extent that it is controlled by Wellington City Council or Wellington Water Ltd</u>	Reject	No

Greater Wellington Regional Council	351.49	Interpretation Subpart / Definitions / WATER SENSITIVE URBAN DESIGN	Support	Considers it aligns with the regional plan definition.	Retain the Definition of 'Water Sensitive Urban Design' as notified.	Accept	No
Tawa Community Board	294.4	Whole PDP / Whole PDP / Whole PDP	Support	Supports the PDP's requirements for hydraulic neutrality.	Retain all provisions relating to Hydraulic Neutrality as notified.	Accept	No
Tyers Stream Group	221.1	Other / Other / Other	Oppose	Considers that the existing three waters infrastructure has suffered from lack of maintenance and renewals, and shows signs of significant failure, causing ongoing and significant contamination (water and air), erosion events and other problems in Tyers Stream. Opposes further development and intensification until significant upgrading of three waters capacity can be ensured and is put in place.	Land use intensification and all development (e.g., residential growth) to only occur if there is a fully functional and resilient Three Waters Infrastructure in place prior to development.	Reject	No
Tyers Stream Group	221.2	Other / Other / Other	Oppose	Considers that the existing three waters infrastructure has suffered from lack of maintenance and renewals, and shows signs of significant failure, causing ongoing and significant contamination (water and air), erosion events and other problems in Tyers Stream. Opposes further development and intensification until significant upgrading of three waters capacity can be ensured and is put in place.	Seeks no urban intensification in the Tyers Stream catchment until the Three Waters Infrastructure has the capacity, the upgrades, the resilience, and appropriate monitoring and maintenance to manage the growth, without causing damage to, and contamination of the stream, the catchment's biodiversity, and its airshed.	Reject	No

Tyers Stream Group	221.3	Other / Other / Other	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks appropriate monitoring and maintenance of infrastructure to ensure retention of capacity, necessary upgrades, resilience, and avoidance of adverse environmental effects.	Reject	No
Jim & Christine Seymour	262.1	Other / Other / Other	Not specified	Considers that current infrastructure cannot cope with significant increases in load. Considers how well the current power network will cope with intensification. [Refer to original submission for full reason]	Seeks that infrastructure - potable and sewer networks in particular - are upgraded before denser housing is implemented.	Reject	No
Claire Nolan, James Fraser, Biddy Bunzl, Margaret Franken, Michelle Wolland, and Lee Muir	275.1	Other / Other / Other	Amend	[No specific reason given beyond decision requested - refer back to original submission]	Seeks that the Council undertake a suburb specific response to assessing the ability of Infrastructure to accommodate impacts on wastewater, water supply and storm water,	Reject	No
Trelissick Park Group	168.2	Energy Infrastructure and Transport / General point on Energy Infrastructure and Transport / General point on Energy Infrastructure and Transport	Not specified	The submitter recognises the difficulty that some sites would have to achieve neutral or lesser stormwater runoff, compared with pre-development. The suggested offsets would need to be funded by the developer as a part of the consent.	Seeks that the offsets requirements of sites, as suggested by the submitter, would need to be funded by the developer as a part of the consent.	Reject	No

Submissions identified in wrap up hearing s42A and included in this document at direction of independent hearings panel, October 2023

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Recommended Hearing Section	Recommendation	Changes to PDP? Y/N
Trelissick Park Group	168.1	Other / Other / Other	Not specified	Considers that with housing intensification and more extreme weather events due to climate change, the problems caused by stormwater in Trelissick Park are becoming worse. [Refer to original submission for full reasons].	Not specified.	5C - Subdivision, Three Waters, and Earthworks	Accept in part	No
Mt Cook Mobilised	331.2	Other / Other / Other	Not specified	Considers that all Community Emergency Hubs should have water tanks on site.	Not specified.	5C - Subdivision, Three Waters, and Earthworks	Reject	No
Mt Cook Mobilised	331.3	Other / Other / Other	Not specified	[No specific reason given beyond decision requested - refer to original submission].	Seeks that all parks have water tanks on site unless they are within the tsunami hazard zone.	5C - Subdivision, Three Waters, and Earthworks	Reject	No
Mt Cook Mobilised	331.4	Other / Other / Other	Not specified	Apartments outside the tsunami zone need to have provision for water tanks in their grounds, in their basements, or in a designated separate storage area within the building. For apartments within the tsunami zone, indoor water storage areas need to be made available on level 5 and above. This is	Seeks that multi-unit dwellings have provisions for water tanks in their grounds, basements, or in designated separate storage areas within their building.	5C - Subdivision, Three Waters, and Earthworks	Reject	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Recommended Hearing Section	Recommendation	Changes to PDP? Y/N
				because anyone living below level 5 will have been asked to evacuate. People living above level 5 may be stranded for some time.				
Mt Cook Mobilised	331.5	Other / Other / Other	Not specified	[No specific reason given beyond decision requested - refer to original submission].	Seeks that water tanks be required for all social housing complexes, particularly for new-builds.	5C - Subdivision, Three Waters, and Earthworks	Reject	No
Mt Cook Mobilised	331.6	Other / Other / Other	Not specified	Considers that apartment blocks should designate an area for humanure collection, or a long drop. Typically, this could be a wheelie bin and a supply of dry carbon matter, e.g. sawdust, used to cover each layer of contents. The wheelie bin would need to be stored for 6 months before it is safe to be disposed of as compost. The Body Corporate needs to determine how this will be done in each apartment complex, and communicate this to residents.	Seeks that apartments blocks be required to designate an area for humanure collection, or a long drop.	5C - Subdivision, Three Waters, and Earthworks	Reject	No