

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Three Waters / General THW	Aro Valley Community Council	87.29	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.
Energy Infrastructure and Transport / Three Waters / General THW	Hugh Good	90.2	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.
Energy Infrastructure and Transport / Three Waters / General THW	Janice Young	140.5	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.
Energy Infrastructure and Transport / Three Waters / General THW	David Stevens	151.7	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.
Energy Infrastructure and Transport / Three Waters / General THW	Trelissick Park Group	168.3	Support	Supports that THW (Three Waters) covers stormwater hydraulic neutrality and water sensitive design.	Retain the Three Waters chapter, with amendments.
Energy Infrastructure and Transport / Three Waters / General THW	Wellington City Youth Council	201.22	Support	Supports Council's actions for water management under the proposed District Plan	Retain the Three Waters chapter as notified.
Energy Infrastructure and Transport / Three Waters / General THW	Wellington City Youth Council	201.23	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.
Energy Infrastructure and Transport / Three Waters / General THW	Wellington City Youth Council	201.24	Not specified	Supports hydraulic neutrality and considers that it should inform future-proof water management approach.	Not specified.
Energy Infrastructure and Transport / Three Waters / General THW	Wellington City Youth Council	201.25	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.
Energy Infrastructure and Transport / Three Waters / General THW	Tyers Stream Group	221.7	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.
Energy Infrastructure and Transport / Three Waters / General THW	Tyers Stream Group	221.8	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.

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Energy Infrastructure and Transport / Three Waters / General THW	Wellington City Council	266.58	Amend	Considers amendments required to wording to align with the NPS-FM.	<p>Amend the Three Waters introduction as follows:</p> <p>(...)</p> <p>Te Mana o te Wai is a <u>hierarchal framework that</u> 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 contribute towards <u>gives effect to</u> Te Mana o te Wai.</p> <p>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.</p> <p>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.</p>
Energy Infrastructure and Transport / Three Waters / General THW	Onslow Residents Community Association	283.7	Amend	<p>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.</p> <p>[Refer to original submission for full reason]</p>	Seeks that the state of the 3-waters infrastructure in Khandallah is considered a qualifying matter.
Energy Infrastructure and Transport / Three Waters / General THW	Tawa Community Board	294.7	Not specified	<p>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.</p> <p>Considers that given the time it will take to fix our water infrastructure and the likelihood of extreme weather leading to increased drought events.</p>	Seeks that the Proposed District Plan provides strong enough direction and encouragement to developers on this issue.
Energy Infrastructure and Transport / Three Waters / General THW	Richard Murcott	322.14	Not specified	<p>Considers that population intensification in Thorndon should be throttled back until 3 waters infrastructure investment has been committed.</p> <p>[Refer to original submission for full reason]</p>	Seeks that population intensification in Thorndon be throttled back until infrastructure investment has been committed.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Three Waters / General THW	The Sustainability Society	339.2	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 (<u>volume</u>), and flow rate of associated stormwater runoff generated is no greater than the <u>pre developed volume and</u> peak runoff <u>flowrate and volume</u> discharged from the site in an undeveloped state." ...
Energy Infrastructure and Transport / Three Waters / General THW	Restaurant Brands Limited	349.8	Support	Support	Retain THW – Te Tūāhanga o Ngā Wai e Toru - Three Waters as notified.
Energy Infrastructure and Transport / Three Waters / General THW	Greater Wellington Regional Council	351.71	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.
Energy Infrastructure and Transport / Three Waters / General THW	Greater Wellington Regional Council	351.72	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.
Energy Infrastructure and Transport / Three Waters / General THW	Greater Wellington Regional Council	351.73	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.
Energy Infrastructure and Transport / Three Waters / General THW	Greater Wellington Regional Council	351.74	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.
Energy Infrastructure and Transport / Three Waters / General THW	Greater Wellington Regional Council	351.75	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.
Energy Infrastructure and Transport / Three Waters / General THW	Jane Szentivanyi and Ben Briggs	369.9	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]
Energy Infrastructure and Transport / Three Waters / General THW	Jane Szentivanyi and Ben Briggs	369.10	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.
Energy Infrastructure and Transport / Three Waters / General THW	Taranaki Whānui ki te Upoko o te Ika	389.53	Support in part	Support the direction of this chapter.	Support introduction direction, seeks amendment.
Energy Infrastructure and Transport / Three Waters / General THW	Taranaki Whānui ki te Upoko o te Ika	389.54	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.

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Energy Infrastructure and Transport / Three Waters / General THW	Kāinga Ora Homes and Communities	391.92	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.
Energy Infrastructure and Transport / Three Waters / General THW	Kāinga Ora Homes and Communities	391.93	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 Overlays areas.
Energy Infrastructure and Transport / Three Waters / General THW	Survey & Spatial New Zealand Wellington Branch	439.8	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 its current or undeveloped 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 the District Plan to...</u>
Energy Infrastructure and Transport / Three Waters / General THW	Survey & Spatial New Zealand Wellington Branch	439.9	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"
Energy Infrastructure and Transport / Three Waters / General THW	Peter Jack	450.2	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.
Energy Infrastructure and Transport / Three Waters / General THW	Te Rūnanga o Toa Rangatira	488.37	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.
Energy Infrastructure and Transport / Three Waters / General THW	Te Rūnanga o Toa Rangatira	488.38	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.
Energy Infrastructure and Transport / Three Waters / General THW	Te Rūnanga o Toa Rangatira	488.39	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.
Energy Infrastructure and Transport / Three Waters / New THW	Wellington City Council	266.59	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>

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Energy Infrastructure and Transport / Three Waters / New THW	Wellington City Council	266.60	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.	<p>Add a new Rule in the Three Waters chapter as follows:</p> <p>Zones that this rule applies to: Medium Density and High-Density Residential Zones</p> <p><u>THW-R7 Permeable Surface 1-3 residential units</u></p> <p><u>1. Activity status: Permitted</u> <u>Where:</u> <u>a. A minimum of 30% of the net site area is permeable surface.</u></p> <p><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></p> <p><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></p>
Energy Infrastructure and Transport / Three Waters / New THW	Wellington City Council	266.61	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.	<p>Add a new Rule in the Three Waters chapter as follows:</p> <p>Zones that this rule applies to: Large Lot Residential Zone</p> <p><u>THW-R8 Large Lot Residential Zone</u></p> <p><u>1. Activity status: Permitted Where:</u> <u>a. A minimum of 60% of the net site area is permeable surface.</u></p> <p><u>2. Activity status: Restricted Discretionary Where:</u> <u>a. Compliance with the requirements of THW-R8.1.a cannot be achieved.</u></p> <p><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></p>
Energy Infrastructure and Transport / Three Waters / New THW	The Sustainability Society	339.3	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.
Energy Infrastructure and Transport / Three Waters / New THW	The Sustainability Society	339.4	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.

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Energy Infrastructure and Transport / Three Waters / New THW	Greater Wellington Regional Council	351.76	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.
Energy Infrastructure and Transport / Three Waters / New THW	Greater Wellington Regional Council	351.77	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).
Energy Infrastructure and Transport / Three Waters / New THW	Greater Wellington Regional Council	351.78	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.
Energy Infrastructure and Transport / Three Waters / New THW	Greater Wellington Regional Council	351.79	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.
Energy Infrastructure and Transport / Three Waters / New THW	Greater Wellington Regional Council	351.80	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.
Energy Infrastructure and Transport / Three Waters / New THW	Greater Wellington Regional Council	351.81	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.
Energy Infrastructure and Transport / Three Waters / New THW	Greater Wellington Regional Council	351.82	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
Energy Infrastructure and Transport / Three Waters / THW-O1	Tyers Stream Group	221.9	Support	Supports THW-O1.	Retain THW-O1 (Protecting water bodies and freshwater ecosystems) as notified.
Energy Infrastructure and Transport / Three Waters / THW-O1	Claire Nolan, James Fraser, Biddy Bunzl, Margaret Franken, Michelle Wolland, and Lee Muir	275.9	Support	Supports THW-O1 (Protecting water bodies and freshwater ecosystems).	Retain THW-O1 (Protecting water bodies and freshwater ecosystems) as notified.
Energy Infrastructure and Transport / Three Waters / THW-O1	Heidi Snelson, Aman Hunt, Chia Hunt, Ela Hunt	276.6	Not specified	<p>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.</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.

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Energy Infrastructure and Transport / Three Waters / THW-O1	WCC Environmental Reference Group	377.25	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-O1 (Protecting water bodies and freshwater ecosystems) as notified.
Energy Infrastructure and Transport / Three Waters / THW-O2	Tyers Stream Group	221.10	Support	Supports THW-O2.	Retain THW-O2 (Infrastructure-enabled urban development) as notified.
Energy Infrastructure and Transport / Three Waters / THW-O2	Tyers Stream Group	221.11	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks amendment to THW-O2 (Infrastructure-enabled urban development) to require that sufficient capacity be in place before and subdivision, use or development takes place.
Energy Infrastructure and Transport / Three Waters / THW-O2	Fire and Emergency New Zealand	273.21	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-O2 (Infrastructure-enabled urban development) as notified.
Energy Infrastructure and Transport / Three Waters / THW-O2	Heidi Snelson, Aman Hunt, Chia Hunt, Ela Hunt	276.7	Not specified	Considers that "Well functioning urban environment" does not apply to THW-O2 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.
Energy Infrastructure and Transport / Three Waters / THW-O2	Retirement Villages Association of New Zealand Incorporated	350.27	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-O2].	Retain THW-O2 (Infrastructure-enabled urban development) as notified.
Energy Infrastructure and Transport / Three Waters / THW-O2	WCC Environmental Reference Group	377.26	Support	Supportive of development occurring in places where three waters are already in place.	Retain THW-O2 (Infrastructure-enabled urban development) as notified.
Energy Infrastructure and Transport / Three Waters / THW-O2	Kāinga Ora Homes and Communities	391.94	Support	Objective THW-O2 is generally supported, particularly as it recognises alternative means of servicing development where existing infrastructure is at capacity.	Retain Objective THW-O2 (Infrastructure-enabled urban development) as notified.
Energy Infrastructure and Transport / Three Waters / THW-O2	Survey & Spatial New Zealand Wellington Branch	439.10	Amend	Considers the objective should also refer to Council's ability to fund infrastructure via development contributions.	Amend THW-O2 (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.

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Energy Infrastructure and Transport / Three Waters / THW-O3	Trelissick Park Group	168.4	Support	Supports that THW-O3 (Hydraulic Neutrality) covers stormwater hydraulic neutrality and water sensitive design.	Retain THW-O3 (Hydraulic Neutrality) as notified.
Energy Infrastructure and Transport / Three Waters / THW-O3	Tyers Stream Group	221.12	Support	Supports THW-O3.	Retain THW-O3 (Hydraulic neutrality) as notified.
Energy Infrastructure and Transport / Three Waters / THW-O3	Stratum Management Limited	249.1	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-O3 (Hydraulic neutrality) to support stormwater attenuation where there are infrastructure constraints.
Energy Infrastructure and Transport / Three Waters / THW-O3	Stratum Management Limited	249.2	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-O3 (Hydraulic neutrality) to remove its applicability to the City Centre zone.
Energy Infrastructure and Transport / Three Waters / THW-O3	Stratum Management Limited	249.3	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-O3 (Hydraulic neutrality) in line with the relief sought to Policy THW-P5.
Energy Infrastructure and Transport / Three Waters / THW-O3	Heidi Snelson, Aman Hunt, Chia Hunt, Ela Hunt	276.8	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.
Energy Infrastructure and Transport / Three Waters / THW-O3	Retirement Villages Association of New Zealand Incorporated	350.28	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.
Energy Infrastructure and Transport / Three Waters / THW-O3	WCC Environmental Reference Group	377.27	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>

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Energy Infrastructure and Transport / Three Waters / THW-O3	Kāinga Ora Homes and Communities	391.95	Support	Objective THW-O3 is generally supported.	Retain Objective THW-O3 (Hydraulic neutrality) as notified.
Energy Infrastructure and Transport / Three Waters / THW-O3	Survey & Spatial New Zealand Wellington Branch	439.11	Amend	Considers hydraulic neutrality should refer to the current disposition of a site.	Amend THW-O3 (Hydraulic neutrality) to: 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
Energy Infrastructure and Transport / Three Waters / THW-P1	Trelissick Park Group	168.5	Support	Supports that THW-P1 (Water sensitive design) covers stormwater hydraulic neutrality and water sensitive design.	Retain THW-P1 (Water sensitive design) as notified.
Energy Infrastructure and Transport / Three Waters / THW-P1	Tyers Stream Group	221.13	Support	Supports THW-P1.	Retain THW-P1 (Water sensitive design) as notified.
Energy Infrastructure and Transport / Three Waters / THW-P1	Stratum Management Limited	249.4	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.
Energy Infrastructure and Transport / Three Waters / THW-P1	Wellington City Council	266.62	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.	Amend THW-P1 (Water sensitive design) as follows: 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; <u>3. Address effects of first flush;</u> 3. <u>4.</u> Demonstrate best practice approach to the management of stormwater quality and quantity; 4. <u>5.</u> Reduce demand on water supplies; and 5. <u>6.</u> Reduce wastewater overflows.
Energy Infrastructure and Transport / Three Waters / THW-P1	Heidi Snelson, Aman Hunt, Chia Hunt, Ela Hunt	276.9	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.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Three Waters / THW-P1	Phillippa O'Connor	289.5	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</u> in 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.
Energy Infrastructure and Transport / Three Waters / THW-P1	Mt Victoria Residents' Association	342.20	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.
Energy Infrastructure and Transport / Three Waters / THW-P1	Retirement Villages Association of New Zealand Incorporated	350.29	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.
Energy Infrastructure and Transport / Three Waters / THW-P1	Retirement Villages Association of New Zealand Incorporated	350.30	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.
Energy Infrastructure and Transport / Three Waters / THW-P1	Greater Wellington Regional Council	351.83	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.
Energy Infrastructure and Transport / Three Waters / THW-P1	Greater Wellington Regional Council	351.84	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>
Energy Infrastructure and Transport / Three Waters / THW-P1	Greater Wellington Regional Council	351.85	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.
Energy Infrastructure and Transport / Three Waters / THW-P1	Woolworths New Zealand	359.23	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.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Three Waters / THW-P1	Woolworths New Zealand	359.24	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.
Energy Infrastructure and Transport / Three Waters / THW-P1	WCC Environmental Reference Group	377.28	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> .
Energy Infrastructure and Transport / Three Waters / THW-P1	Kāinga Ora Homes and Communities	391.96	Support	THW-P1 is generally supported.	Retain THW-P1 (Water sensitive design) as notified.
Energy Infrastructure and Transport / Three Waters / THW-P1	Survey & Spatial New Zealand Wellington Branch	439.12	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; <u>and</u> 4. Reduce demand on water supplies; and 5. Reduce wastewater overflows
Energy Infrastructure and Transport / Three Waters / THW-P1	Te Rūnanga o Toa Rangatira	488.40	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.
Energy Infrastructure and Transport / Three Waters / THW-P1	Te Rūnanga o Toa Rangatira	488.41	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 <u>so that the objectives of Te Whanganui a Tara and Porirua Whaitua Implementation can be delivered</u> .
Energy Infrastructure and Transport / Three Waters / THW-P1	Te Rūnanga o Toa Rangatira	488.42	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.
Energy Infrastructure and Transport / Three Waters / THW-P2	Tyers Stream Group	221.14	Support	Supports THW-P2.	Retain THW-P2 (Building materials) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Three Waters / THW-P2	Rimu Architects Ltd	318.14	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.
Energy Infrastructure and Transport / Three Waters / THW-P2	WCC Environmental Reference Group	377.29	Support	Supportive and the Policy gives effect to Policy 3 of the NPS-FM.	Retain THW-P2 (Building Materials) as notified.
Energy Infrastructure and Transport / Three Waters / THW-P2	Kāinga Ora Homes and Communities	391.97	Support in part	THW-P2 is generally supported and an amendment is sought.	Retain THW-P2 (Building Materials) with amendment.
Energy Infrastructure and Transport / Three Waters / THW-P2	Kāinga Ora Homes and Communities	391.98	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.
Energy Infrastructure and Transport / Three Waters / THW-P3	Tyers Stream Group	221.15	Support	Supports THW-P3.	Retain THW-P3 (Infrastructure-enabled urban development) with amendment.
Energy Infrastructure and Transport / Three Waters / THW-P3	Tyers Stream Group	221.16	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.
Energy Infrastructure and Transport / Three Waters / THW-P3	Fire and Emergency New Zealand	273.22	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.
Energy Infrastructure and Transport / Three Waters / THW-P3	Claire Nolan, James Fraser, Biddy Bunzl, Margaret Franken, Michelle Wolland, and Lee Muir	275.10	Support	Supports THW-P3 (Infrastructure-enabled urban development).	Retain THW-P3 (Infrastructure-enabled urban development) as notified.
Energy Infrastructure and Transport / Three Waters / THW-P3	Retirement Villages Association of New Zealand Incorporated	350.31	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.
Energy Infrastructure and Transport / Three Waters / THW-P3	Retirement Villages Association of New Zealand Incorporated	350.32	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.
Energy Infrastructure and Transport / Three Waters / THW-P3	WCC Environmental Reference Group	377.30	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.
Energy Infrastructure and Transport / Three Waters / THW-P3	Kāinga Ora Homes and Communities	391.99	Support	THW-P3 is generally supported.	Retain THW-P3 (Infrastructure-enabled urban development) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Three Waters / THW-P3	Survey & Spatial New Zealand Wellington Branch	439.13	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
Energy Infrastructure and Transport / Three Waters / THW-P4	Tyers Stream Group	221.17	Support	Supports THW-P4.	Retain THW-P4 (Three waters infrastructure servicing) as notified.
Energy Infrastructure and Transport / Three Waters / THW-P4	Fire and Emergency New Zealand	273.23	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.
Energy Infrastructure and Transport / Three Waters / THW-P4	Fire and Emergency New Zealand	273.24	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>
Energy Infrastructure and Transport / Three Waters / THW-P4	Claire Nolan, James Fraser, Biddy Bunzl, Margaret Franken, Michelle Wolland, and Lee Muir	275.11	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.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Three Waters / THW-P4	Heidi Snelson, Aman Hunt, Chia Hunt, Ela Hunt	276.10	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.
Energy Infrastructure and Transport / Three Waters / THW-P4	Rimu Architects Ltd	318.15	Amend	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.	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.
Energy Infrastructure and Transport / Three Waters / THW-P4	Retirement Villages Association of New Zealand Incorporated	350.33	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-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.
Energy Infrastructure and Transport / Three Waters / THW-P4	Retirement Villages Association of New Zealand Incorporated	350.34	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.	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.
Energy Infrastructure and Transport / Three Waters / THW-P4	Greater Wellington Regional Council	351.86	Support in part	Supports the need for sufficient infrastructure capacity prior to development, and this direction aligns with the Operative RPS.	Retain provision, subject to amendments, as outlined other submission points.
Energy Infrastructure and Transport / Three Waters / THW-P4	WCC Environmental Reference Group	377.31	Amend	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>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>
Energy Infrastructure and Transport / Three Waters / THW-P4	Kāinga Ora Homes and Communities	391.100	Support in part	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.	Retain THW-P4 (Three waters infrastructure servicing) with amendment.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Three Waters / THW-P4	Kāinga Ora Homes and Communities	391.101	Amend	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.	Amend THW-P4 (Three waters infrastructure servicing) as follows: ... Limit <u>Provide for</u> subdivision and development in urban areas where existing three waters capacity and/or level of service is insufficient to service further development, <u>including and</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 or 2. <u>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.</u>
Energy Infrastructure and Transport / Three Waters / THW-P4	Survey & Spatial New Zealand Wellington Branch	439.14	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 unless ensure : 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.
Energy Infrastructure and Transport / Three Waters / THW-P4	The Thorndon Society Inc	487.3	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> "
Energy Infrastructure and Transport / Three Waters / THW-P5	Rod Halliday	25.19	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.
Energy Infrastructure and Transport / Three Waters / THW-P5	Trelissick Park Group	168.6	Support	Supports that THW-P5 (Hydraulic neutrality) covers stormwater hydraulic neutrality and water sensitive design.	Retain THW-P5 (Hydraulic neutrality) as notified.
Energy Infrastructure and Transport / Three Waters / THW-P5	Tyers Stream Group	221.18	Support	Supports THW-P5.	Retain THW-P5 (Hydraulic neutrality) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Three Waters / THW-P5	Stratum Management Limited	249.5	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 of 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.
Energy Infrastructure and Transport / Three Waters / THW-P5	Stratum Management Limited	249.6	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 of 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.
Energy Infrastructure and Transport / Three Waters / THW-P5	Stratum Management Limited	249.7	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 of 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.
Energy Infrastructure and Transport / Three Waters / THW-P5	Heidi Snelson, Aman Hunt, Chia Hunt, Ela Hunt	276.11	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.
Energy Infrastructure and Transport / Three Waters / THW-P5	Phillippa O'Connor	289.6	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.	<p>Amend THW-P5 (Hydraulic neutrality) as follows:</p> <p>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 <u>pre-developed</u> state.</p>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Three Waters / THW-P5	Retirement Villages Association of New Zealand Incorporated	350.35	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.
Energy Infrastructure and Transport / Three Waters / THW-P5	Retirement Villages Association of New Zealand Incorporated	350.36	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.
Energy Infrastructure and Transport / Three Waters / THW-P5	Woolworths New Zealand	359.25	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 undeveloped state <u>pre-developed state</u> .
Energy Infrastructure and Transport / Three Waters / THW-P5	WCC Environmental Reference Group	377.32	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.
Energy Infrastructure and Transport / Three Waters / THW-P5	Michelle Rush	436.11	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.
Energy Infrastructure and Transport / Three Waters / THW-P5	Survey & Spatial New Zealand Wellington Branch	439.15	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 its current an undeveloped state .
Energy Infrastructure and Transport / Three Waters / THW-R1	Trelissick Park Group	168.7	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.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Three Waters / THW-R1	Trelissick Park Group	168.8	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 <u>for Wastewater and Water supply</u> cannot be achieved. ...
Energy Infrastructure and Transport / Three Waters / THW-R1	Tyers Stream Group	221.19	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.
Energy Infrastructure and Transport / Three Waters / THW-R1	Tyers Stream Group	221.20	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).
Energy Infrastructure and Transport / Three Waters / THW-R1	Fire and Emergency New Zealand	273.25	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.
Energy Infrastructure and Transport / Three Waters / THW-R1	Fire and Emergency New Zealand	273.26	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.
Energy Infrastructure and Transport / Three Waters / THW-R1	Claire Nolan, James Fraser, Biddy Bunzl, Margaret Franken, Michelle Wolland, and Lee Muir	275.12	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.
Energy Infrastructure and Transport / Three Waters / THW-R1	WCC Environmental Reference Group	377.33	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.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Three Waters / THW-R1	Survey & Spatial New Zealand Wellington Branch	439.16	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.
Energy Infrastructure and Transport / Three Waters / THW-R2	Trelissick Park Group	168.9	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.
Energy Infrastructure and Transport / Three Waters / THW-R2	Trelissick Park Group	168.10	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 <u>Wastewater and Water supply</u> cannot be achieved. ...
Energy Infrastructure and Transport / Three Waters / THW-R2	Avryl Bramley	202.10	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 <u>Restricted Discretionary</u> ...
Energy Infrastructure and Transport / Three Waters / THW-R2	Tyers Stream Group	221.21	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.
Energy Infrastructure and Transport / Three Waters / THW-R2	Fire and Emergency New Zealand	273.27	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.
Energy Infrastructure and Transport / Three Waters / THW-R2	Fire and Emergency New Zealand	273.28	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.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Three Waters / THW-R2	Claire Nolan, James Fraser, Biddy Bunzl, Margaret Franken, Michelle Wolland, and Lee Muir	275.13	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.
Energy Infrastructure and Transport / Three Waters / THW-R2	Retirement Villages Association of New Zealand Incorporated	350.37	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.
Energy Infrastructure and Transport / Three Waters / THW-R2	WCC Environmental Reference Group	377.34	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.
Energy Infrastructure and Transport / Three Waters / THW-R2	Kāinga Ora Homes and Communities	391.102	Support	THW-R2 is generally supported.	Retain THW-R2 (Connection to existing three waters infrastructure...) as notified.
Energy Infrastructure and Transport / Three Waters / THW-R2	Survey & Spatial New Zealand Wellington Branch	439.17	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.
Energy Infrastructure and Transport / Three Waters / THW-R2	The Thorndon Society Inc	487.4	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;
Energy Infrastructure and Transport / Three Waters / THW-R2	The Thorndon Society Inc	487.5	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 or a non-residential building;
Energy Infrastructure and Transport / Three Waters / THW-R3	Tyers Stream Group	221.22	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.
Energy Infrastructure and Transport / Three Waters / THW-R3	WCC Environmental Reference Group	377.35	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.
Energy Infrastructure and Transport / Three Waters / THW-R4	Trelissick Park Group	168.11	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.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Three Waters / THW-R4	Trelissick Park Group	168.12	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.
Energy Infrastructure and Transport / Three Waters / THW-R4	Tyers Stream Group	221.23	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.
Energy Infrastructure and Transport / Three Waters / THW-R4	Stratum Management Limited	249.8	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.
Energy Infrastructure and Transport / Three Waters / THW-R4	Stratum Management Limited	249.9	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.
Energy Infrastructure and Transport / Three Waters / THW-R4	Phillippa O'Connor	289.7	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).
Energy Infrastructure and Transport / Three Waters / THW-R4	Phillippa O'Connor	289.8	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.
Energy Infrastructure and Transport / Three Waters / THW-R4	The Sustainability Society	339.5	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.
Energy Infrastructure and Transport / Three Waters / THW-R4	Retirement Villages Association of New Zealand Incorporated	350.38	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.
Energy Infrastructure and Transport / Three Waters / THW-R4	Greater Wellington Regional Council	351.87	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.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Three Waters / THW-R4	Woolworths New Zealand	359.26	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.
Energy Infrastructure and Transport / Three Waters / THW-R4	WCC Environmental Reference Group	377.36	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.
Energy Infrastructure and Transport / Three Waters / THW-R4	Survey & Spatial New Zealand Wellington Branch	439.18	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
Energy Infrastructure and Transport / Three Waters / THW-R5	Rod Halliday	25.20	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.
Energy Infrastructure and Transport / Three Waters / THW-R5	Trelissick Park Group	168.13	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.
Energy Infrastructure and Transport / Three Waters / THW-R5	Trelissick Park Group	168.14	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.
Energy Infrastructure and Transport / Three Waters / THW-R5	Wellington City Youth Council	201.26	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.
Energy Infrastructure and Transport / Three Waters / THW-R5	Tyers Stream Group	221.24	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.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Three Waters / THW-R5	Tyers Stream Group	221.25	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.
Energy Infrastructure and Transport / Three Waters / THW-R5	Stratum Management Limited	249.10	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.
Energy Infrastructure and Transport / Three Waters / THW-R5	Stratum Management Limited	249.11	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.
Energy Infrastructure and Transport / Three Waters / THW-R5	WCC Environmental Reference Group	377.37	Support	THW-R5 is supported as it operationalises the relevant objectives and policies.	Retain THW-R5 (Hydraulic neutrality...) as notified.
Energy Infrastructure and Transport / Three Waters / THW-R5	Survey & Spatial New Zealand Wellington Branch	439.19	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.	<p>Amend THW-R5 (Hydraulic neutrality – 1-3 residential units) to:</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. It involves the construction of 1-3 residential units; and</p> <p>b. A Wellington Water Limited approved solution for managing volume and rate of stormwater runoff is installed as part of the development; or</p> <p><u>c. 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></p>
Energy Infrastructure and Transport / Three Waters / THW-R6	Rod Halliday	25.21	Amend	<p>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.</p> <p>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.</p> <p>Previous developments in these catchments, including Churton Park subdivisions over the last 5+ years, have had no requirement for stormwater neutrality.</p>	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.
Energy Infrastructure and Transport / Three Waters / THW-R6	Trelissick Park Group	168.15	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.
Energy Infrastructure and Transport / Three Waters / THW-R6	Trelissick Park Group	168.16	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.
Energy Infrastructure and Transport / Three Waters / THW-R6	Wellington City Youth Council	201.27	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.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Three Waters / THW-R6	Tyers Stream Group	221.26	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.
Energy Infrastructure and Transport / Three Waters / THW-R6	Stratum Management Limited	249.12	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.
Energy Infrastructure and Transport / Three Waters / THW-R6	Stratum Management Limited	249.13	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.
Energy Infrastructure and Transport / Three Waters / THW-R6	Phillippa O'Connor	289.9	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.	<p>Amend THW-R6 (Hydraulic neutrality – four or more residential units and non-residential buildings) as follows:</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. It involves the construction of multi-unit housing, retirement villages, comprehensive development or a non-residential building; and</p> <p>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>.</p> <p>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.</p>
Energy Infrastructure and Transport / Three Waters / THW-R6	Phillippa O'Connor	289.10	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.
Energy Infrastructure and Transport / Three Waters / THW-R6	Retirement Villages Association of New Zealand Incorporated	350.39	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.
Energy Infrastructure and Transport / Three Waters / THW-R6	Woolworths New Zealand	359.27	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.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Three Waters / THW-R6	Woolworths New Zealand	359.28	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.	<p>Amend THW-R6 (Hydraulic neutrality – four or more residential units and non-residential buildings) as follows:</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. It involves the construction of multi-unit housing, retirement villages, comprehensive development or a non-residential building; and</p> <p>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>.</p>
Energy Infrastructure and Transport / Three Waters / THW-R6	Survey & Spatial New Zealand Wellington Branch	439.20	Amend	Considers hydraulic neutrality should refer to the current disposition of a site.	<p>Amend THW-R6 (Hydraulic neutrality – four or more residential units and non-residential buildings) to:</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. It involves the construction of multi-unit housing, retirement villages, comprehensive development or a non-residential building; and</p> <p>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 an undeveloped state</u></p>