

## **Civil Contractors New Zealand submission on Proposed Change 1 to the Natural Resources Plan for the Wellington Region**

Contact: **Fraser May**  
Communications and Advocacy Manager  
Civil Contractors New Zealand  
PO Box 12013  
**Wellington**

**Date:** 20 December 2023

### **1. Introduction**

- 1.1 Civil Contractors New Zealand (CCNZ) is the national industry body for horizontal construction, representing more than 500 companies responsible for the physical construction and maintenance of New Zealand's infrastructure networks, including roading, water, public spaces, seawalls, rail networks, forestry roads, wind farms and much more. CCNZ also has more than 300 associate members that supply contractors with equipment and services.
- 1.2 Funded by its members, CCNZ works to increase understanding of the needs of civil construction companies to New Zealanders, improve industry practices and users' technical knowledge, and assist in developing a highly skilled workforce within a safe and sustainable work environment.
- 1.3 In addition to national representation, CCNZ also has 12 regional branches, including a Wellington Wairarapa Branch.
- 1.4 We would like to thank the Greater Wellington Regional Council for the opportunity to comment on the proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region.
- 1.5 We would like to further discuss the issues raised in this submission with Council.

### **2. Key Points**

Our submission makes the following key points:

- 2.1 CCNZ considers the proposals in Plan Change 1 will have significant impacts on the region's civil construction industry, will result in increased costs for ratepayers, and are unlikely to result in better environmental or consenting outcomes.

- 2.2 The changes to the definition of earthworks in **2.2** need refinement. These changes will at the least require considerable resource from industry to understand and implement, and at worst, the change to the definitions may greatly escalate project costs.
- 2.3 The addition of 'to a cleanfill area' to 2.2 (i) is problematic, as there are severe constraints around sites in the greater Wellington region at the moment. For the past two years, there has largely only been one cleanfill site, so we have seen instances of contractors required to take fill to other regions, sometimes at distances of 170kms, at great cost to ratepayers.
- 2.4 It is appropriate that well-managed sites should be set up for disposal of cleanfill, but presently this is not the case. The regional availability of cleanfill sites needs to be taken into account before this is written into the plan, or this may significantly hamper the region's ability to deliver infrastructure projects.
- 2.5 **Policy P.P29, WH.P31, WH.R24 and P.R23 (b)** read as no winter works permits will be available. By the guidelines winter works permits are actually only for shutting a job down to make safe. The way this clause is written risks stopping ALL jobs in winter, and this needs clarification. A 'hard shutdown' over winter, where no winter earthworks permits are issued, will render civil construction and earthmoving companies unable to retain staff, and inability to conduct remedial works if site issues do occur.
- 2.6 By our (rough) estimate, more than 90 per cent of earthworks were shut down over 2023 winter in the region. This makes it impossible for companies to retain staff or provide ongoing training and employment to skilled civil construction workers. If civil construction companies are effectively forced to shut their doors over winter months, this will render workers unemployed and increase project costs significantly.
- 2.7 Also, the plan change does not take into account differences in material worked or terrain. It's clear that some winter works must be allowed via resource consents or some other avenue, if the site meets certain criteria. Sand jobs, for instance, have much less sediment and runoff in rainfall, and do not need to be shut down in winter. Winter is actually a better time for these jobs to run, as there is less dust.
- 2.8 We consider a hard shutdown of earthworks sites for four months of the year is excessive. There need to be mechanisms where work can continue if sediment and soil runoff risks can be properly controlled, in particular on sand. These policies and rules should be amended to ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'.
- 2.9 The proposed new regulations around vegetation clearance (for instance Rule WH.R18) may require engagement with industry if they are implemented so that contractors can adequately understand their responsibilities around sediment control while working on vegetation clearance sites. CCNZ can support GWRC in this engagement.
- 2.10 Test methodologies should be appropriate to how monitoring occurs on site. Industry uses turbidity as a measure for earthworks consents, whereas Plan Change 1 specifies a measure of total suspended solids (to measure grams of sediment per m<sup>3</sup>).

The issue with specifying 100g/m<sup>3</sup> is that this is a lab test and will take 1-2 weeks to report a result – which is arbitrary because it is based on a point in time.

The correct test methodology for earthworks is Nephelometric Turbidity Units (NTU), which still measures a point in time test but can be implemented in situ for real time testing.

- 2.11 Real-time NTU testing is a much better test to use, as the Total Suspended Solids (TSS) g/m<sup>3</sup> measure is purely a lab test doesn't correlate to the on-site measures at all.
- 2.12 Members have advised it is unwise to include an impassable threshold in any standard, because at a point in time, rainfall events or unanticipated weather will throw this measure out. For instance, at certain points in time (for instance flooding) no site would comply *even if there was no discharge from the site itself*, so no work would be able to meet this term in consent.

On this note, it is better to include specific numbers in the guidance on how the standards set by the Natural Resources Plan are implanted on work sites, rather than in the Natural Resources Plan itself.

- 2.13 The other impact is on the type of material being worked – e.g. pumice is light, material is light in weight yet it will not exceed the 100g/m<sup>3</sup> threshold. Iron sand is heavy, and even a little will exceed the 100g/m<sup>3</sup> threshold.
- 2.14 Further to the above, there is not enough lab testing capacity to conduct testing on total suspended solids in the manner suggested in Plan Change 1. It is also unclear who a 'suitably qualified person' for monitoring discharge would be.

If there is a qualification in respect to sediment control in addition to standard measures, it needs to be achievable by contractors, or it will drive up project costs, and increase delays.

### 3. Specific recommendations

For specific recommendations, please see our comments completed in form 5.

### 4. The Importance of Cleanfill

Cleanfill is clean (not contaminated) soil removed during earthmoving activities. While it can be reused, it does not have adequate structural properties to be used for building foundations, and it requires good sediment control to stabilise.

Across the Greater Wellington region, civil contractors move upwards of 1,000,000 cubic metres of cleanfill each year from slips, construction projects and other infrastructure construction activities (enough to fill Sky Stadium).

The Greater Wellington region is currently experiencing a major shortage of available cleanfill disposal sites, with a single significant site left in Wellington near the Southern Landfill. This is greatly escalating project costs.

Council should identify and explore appropriate sites for cleanfill disposal and enable these, the alternative being that the region's ability to construct infrastructure will be significantly hampered, escalating costs, impacting council projects, local businesses and regional development, as well as private developers.

We appreciate sediment control is an important factor when planning land use for cleanfill sites, and would encourage GWRC to provide more clarity about appropriate locations and conditions for these sites.

## **5. Conclusion**

Thank you for the opportunity to make this submission. We consider this to be a matter of importance, not just for civil contractors, but for the future development of the region, and we would be happy to provide any further information if required.

We would also be happy to appear in person to support this submission and further discuss the impacts this proposed plan change may have on the region's civil contractors, and their ability to construct and maintain civil infrastructure.

Kind regards,

Fraser May  
Communications and Advocacy Manager  
Civil Contractors New Zealand Inc.  
[Fraser@civilcontractors.co.nz](mailto:Fraser@civilcontractors.co.nz)  
027 8222 107



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

Please enter your details below	
<p><b>*Submitter Name:</b> Full name, or Name of Organisation / Company</p>	Insert
<p><b>Contact person for submission:</b> (If different to above)</p>	Insert
<p><b>Telephone no:</b> (Not required)</p>	Insert
<p><b>*Address for service:</b> (Email, or physical address) Please note, an <u>email address</u> is the preferred method</p>	Insert
<p><b>*I wish to be heard in support of my submission at a hearing</b></p>	Select yes or no
<p><b>*I would consider presenting a joint case at the hearing with others who make a similar submission</b></p>	Select yes or no
<p><b>*I could gain an advantage in trade competition through this submission</b></p>	Yes
<p>Only answer this question if you answered 'yes' to the above question. <b>I am directly affected by an effect of the subject matter of the submission that:</b> <b>A) adversely affects the environment; and</b> <b>B) does not relate to trade competition or the effects of trade competition</b></p>	Select A or B
<p><b>In providing a submission to Greater Wellington, I agree to having read and understood the terms and process outlined in our <b>Information Statement</b></b></p>	
<p>If providing a submission on behalf of a company / organisation <b>I confirm that I have authority to do so:</b></p>	Signature
<p><b>Date:</b></p>	Insert
<p>Please enter your feedback in the next worksheet "<b>2) Feedback on Provisions</b>". All of the provisions in the proposed change have been included so please place your comments in the corresponding cells. If you have questions on how to use this submission form please use our <b>Submitter User Help Guide</b> or email one of our friendly team at <a href="mailto:regionalplan@gw.govt.nz">regionalplan@gw.govt.nz</a></p>	

Chapter No and Name	Provision No. & Title	Type of Change	Stance	RMA Process	Reason for feedback:	Decision Sought *
		Amended New Not applicable to Whaitua Not applicable to Te-Awarua-o- Porirua N/A	Support Oppose Neutral Amend Not stated	Freshwater Part 1 Schedule 1 Both	Please provide a summary of the reasons for your feedback on each provision to help us understand your position.	Please describe the actual changes to the provision that you would like to see and, where possible, include your suggested alternative wording.  NOTE: Any deletions should be identified using <del>strikethrough</del> , and insertions should be identified using <b>bold</b> .
<b>2 Interpretation</b>	<b>2.2 Definitions</b>	Amended		Both		
	Afforestation	New	Select stance	Freshwater		
	Allocation amount	Amended	Select stance	Part 1 Schedule 1		
	Annual stocking rate	New	Select stance	Freshwater		
	Catchment management unit	Amended	Select stance	Part 1 Schedule 1		
	Coastal water management units	New	Select stance	Part 1 Schedule 1		
	Containment standard	New	Support	Part 1 Schedule 1		Retain as drafted, or ensure that any changes preserve the approach of: 1) referring to each discharge location, rather than the whole network, and 2) assessing compliance by reference to average annual weather conditions (as simulated by a computer model) rather than by reference to the actual number of wet weather overflow events in a given year.
	Core allocation	Amended	Select stance	Part 1 Schedule 1		
	Dry weather discharges	New	Amend	Part 1 Schedule 1		Revise definition as follows: Constructed or uncontrolled discharges of wastewater from a wastewater network or stormwater network that are not attributable to wet weather, often generally as a result of pipe blockage, pipe breakage, cross-connections in the publicly-owned network or mechanical or power failure, in a network during periods of dry weather.
	Earthworks	New	Amend	Part 1 Schedule 1	The changes to the definition of earthworks in 2.2 need refinement. These changes will at the least require considerable resource from industry to understand and implement, and at worst. The new definition for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua is not needed, as it applies the term too broadly. The change to the definitions may greatly escalate project costs. The addition of 'to a cleanfill area' to 2.2 (i) is also problematic, as	The new definition for earthworks for Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua should be removed and the former definition applied, as the new definition removes the current earthworks exclusions. As written, the new earthworks definition will likely result in worse outcomes and impact the ability for transport and water infrastructure networks to be repaired or maintained efficiently, resulting in escalated cost and extended timeframes. The new definition may result in consent applications being required for minor pipe or road repairs - something we do not have capacity or time to service as a region. Secondly, 'to a cleanfill area' to be removed from the point in definition for 'all other whaitua'.
	Effective hectares	New	Select stance	Freshwater		
	Environmental outcomes	New	Select stance	Part 1 Schedule 1		
	Erosion and sediment management plan	New	Select stance	Freshwater		
	Erosion risk treatment plan	New	Select stance	Freshwater		
	Existing wastewater discharge	New	Support	Part 1 Schedule 1		
	Harbour arm catchments	New	Select stance	Part 1 Schedule 1		
	Harvesting	New	Select stance	Freshwater		
	High risk industrial or trade premise	New	Select stance	Part 1 Schedule 1		
	Highest erosion risk land (plantation forestry)	New	Select stance	Freshwater		
	Highest erosion risk land (pasture)	New	Select stance	Freshwater		
	High erosion risk land (pasture)	New	Select stance	Freshwater		
	Highest erosion risk land (woody vegetation)	New	Select stance	Freshwater		
	Hydrological control	New	Select stance	Part 1 Schedule 1		
	Impervious surfaces	New	Amend	Part 1 Schedule 1		Replace the reference to "stormwater" with 'rainfall', 'water', 'precipitation', or similar. Review and refine the list of exclusions in light of their implications for the rules. Refer to aggregate rather than metal. Remove duplicate references to 'porous or permeable paving'. Reconsider the reference to "reuse" which should be for 'non-potable purposes' to align with RPS language rather than 'grey water'. The final two bullet points have different approaches to permanent plumbing and use different terms for the same outcome (non-potable water use); this needs to be reconsidered also.
	Intensive grazing	New	Select stance	Freshwater		
	Limit	New	Select stance	Part 1 Schedule 1		
	Mechanical land preparation	New	Select stance	Freshwater		
	Nationally threatened freshwater species	New	Select stance	Part 1 Schedule 1		
	Nitrogen discharge risk	New	Select stance	Freshwater		
	Part Freshwater Management Unit	New	Select stance	Freshwater		
	Primary contact sites	New	Amend	Freshwater	It adds unnecessary complication separating these from the coastal recreation sites.	Consider combining the primary contact sites with the Schedule H recreation sites.
	Recognised Nitrogen Risk Assessment Tool	New	Select stance	Freshwater		
	Redevelopment	New	Select stance	Part 1 Schedule 1		
	Registration	New	Select stance	Freshwater		
	Registered forestry adviser	New	Select stance	Freshwater		
	Replanting	New	Select stance	Freshwater		
	Sacrifice paddocks	New	Select stance	Freshwater		
	Small stream riparian programme	New	Select stance	Freshwater		
	Stabilisation	New	Select stance	Part 1 Schedule 1		
	Stormwater	Amended	Select stance	Part 1 Schedule 1		
	Stormwater catchment or sub-catchment	New	Select stance	Part 1 Schedule 1		
	Stormwater management strategy	New	Select stance	Part 1 Schedule 1		
	Stormwater network	Amended	Select stance	Part 1 Schedule 1		

	Stormwater treatment system	New	Amend	Part 1 Schedule 1	Amend for clarity by deleting 'green infrastructure', which has no official defined meaning, and referring to 'contamination in stormwater' rather than stormwater contaminants.	Delete reference to 'green infrastructure'. Refer to 'contamination in stormwater', rather than 'stormwater contaminants.'
	Stocking rate	New	Select stance	Freshwater		
	Stock unit	New	Select stance	Freshwater		
	Unplanned greenfield development	New	Select stance	Part 1 Schedule 1		
	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)	New	Select stance	Freshwater		
	Wastewater network catchment or sub-catchment	New	Select stance	Part 1 Schedule 1		
	Wet weather overflows	New	Amend	Part 1 Schedule 1	This definition is generally supported, but either the definition or the associated rules should distinguish between private and public networks.	Amend this definition or associated rules to distinguish between private and public networks.
	Whaitua	Amended	Select stance	Part 1 Schedule 1		
	Winter Stocking rate	New	Select stance	Freshwater		
<b>3 Objectives</b>	<b>Amendments to Chapter 3 - Objectives</b>	Not applicable to Whaitua		Part 1 Schedule 1		
	Objective O2	Not applicable to Whaitua	Oppose	Part 1 Schedule 1	We support Wellington Water's submission that this should be retained as these benefits should be recognised regardless of the location	Retain the application of O2 in all locations.
	Objective O5	Not applicable to Whaitua	Select stance	Freshwater		
	Objective O6	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O17	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O20	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O34	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O35	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O36	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O37	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O38	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	<b>3.6 Water quality</b>	Amended/Not applicable to Whaitua		Part 1 Schedule 1		
	Objective O18: Rivers, lakes, natural wetlands and coastal water are suitable for contact recreation and Māori customary use.	Amended	Select stance	Part 1 Schedule 1		
	Table 3.1 Primary contact recreation and Māori customary use objectives in freshwater bodies.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Table 3.2 Secondary contact and Māori customary use recreation objectives in freshwater bodies.	Amended	Select stance	Part 1 Schedule 1		
	Table 3.3 Contact recreation and Māori customary use objectives in coastal water.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	<b>3.7 Biodiversity, aquatic ecosystem health and mahinga kai</b>	Amended/Not applicable to Whaitua		Part 1 Schedule 1		
	Objective O19: Biodiversity, aquatic ecosystem health and mahinga kai in fresh water bodies and the coastal marine area are safeguarded.	Amended	Select stance	Part 1 Schedule 1		
	Table 3.4 Rivers and Streams.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Table 3.5 Lakes.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Table 3.6 Groundwater.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Table 3.7 Natural wetlands.	Amended	Select stance	Part 1 Schedule 1		
	Table 3.8 Coastal waters.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	<b>3.8 Sites with significant values</b>	Amended		Part 1 Schedule 1		
	Objective O25: Outstanding water bodies identified in Schedule A (outstanding water bodies) and their significant values are protected and restored.	Amended	Select stance	Part 1 Schedule 1		
	Objective O28: Ecosystems and habitats with significant indigenous biodiversity values are protected from the adverse effects of use and development, and where appropriate restored to a healthy functioning state including as defined by Tables 3.4, 3.5, 3.6, 3.7 and 3.8.	Amended	Select stance	Part 1 Schedule 1		
<b>4 Policies</b>		Not applicable to Whait / Not applicable to Whaitua Te Awarua-o-Porirua		<b>Part 1 Schedule 1</b>		
	Policy P65: National Policy Statement for Freshwater Management requirements for discharge consents.	Not applicable to Whaitua	Select stance	Freshwater		
	Policy P70: Minimising effects of rural land use activities.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P71: Managing the discharge of nutrients.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P72: Priority Catchments.	Not applicable to Whaitua	Select stance	Freshwater		

	Policy P73: Implementation of farm environment plans in priority catchments.	Not applicable to Whaitua	Select stance	Freshwater		
	Policy P74: Avoiding an increase in adverse effects of rural land use activities and associated diffuse discharges of contaminants.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P76: Consent duration for rural land use in priority catchments.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P77: Improving water quality for contact recreation and Māori customary use.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P79: Quality of point source discharges to rivers.	Not applicable to Whaitua	Select stance	Freshwater		
	Policy P82: Avoiding inappropriate discharges to water.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P83: Minimising adverse effects of stormwater discharges.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P84: Managing land use impacts on stormwater.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P85: Development of a stormwater management strategy for first-stage local authority and state highway network consents.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P86: Second-stage local authority and state highway network consents.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P87: Minimising wastewater and stormwater interactions.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P88: Assessing resource consents to discharge stormwater containing wastewater.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P118: Water takes at minimum flows and minimum water levels.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
	Policy P121: Core allocation for rivers.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
	<b>4.6 Biodiversity, aquatic ecosystem health and mahinga kai.</b>	Amended		Part 1 Schedule 1		
	Policy P30: Biodiversity, aquatic ecosystem health and mahinga kai.	Amended	Select stance	Part 1 Schedule 1		
	Policy P36: Restoring Wairarapa Moana	Amended	Select stance	Part 1 Schedule 1		
	<b>4.7.3 Sites with significant indigenous biodiversity value.</b>	Amended		Part 1 Schedule 1		
	Policy P45: Protecting trout habitat.	Amended	Select stance	Part 1 Schedule 1		
	<b>4.9.1 Discharges to land and water.</b>	Amended		Part 1 Schedule 1		
	Policy P78: Managing point source discharges for aquatic ecosystem health and mahinga kai.	Amended	Select stance	Part 1 Schedule 1		
<b>5.1 Air quality rules</b>	<b>5.1.2 Outdoor burning.</b>	Amended		Part 1 Schedule 1		
	Rule R1: Outdoor burning – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R3: Outdoor burning for firefighter training – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.4 Large scale combustion activities.</b>	Amended		Part 1 Schedule 1		
	Rule R7: Natural gas and liquefied petroleum gas – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R8: Diesel or kerosene blends – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R9: Biogas – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R10: Untreated wood – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R11: Coal, light fuel oil, and petroleum distillates of higher viscosity – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R12: Emergency power generators – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.5 Chemical and metallurgical processes.</b>	Amended		Part 1 Schedule 1		
	Rule R14: Spray coating within an enclosed space – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R15: Spray coating not within an enclosed space – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R16: Printing processes – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R17: Dry cleaning – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R18: Fume cupboards – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R19: Workplace ventilation – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R20: Mechanical processing of metals – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R21: Thermal metal spraying – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.7 Dust generating activities.</b>	Amended		Part 1 Schedule 1		
	Rule R25: Abrasive blasting within an enclosed booth – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R26: Abrasive blasting outside an enclosed area – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R27: Handling of bulk solid materials – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R28: Cement storage – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.8 Food, animal or plant matter manufacturing and processing.</b>	Amended		Part 1 Schedule 1		
	Rule R29: Alcoholic beverage production – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R30: Coffee roasting – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R31: Food, animal or plant matter manufacturing and processing – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.9 Fuel storage</b>	Amended		Part 1 Schedule 1		
	Rule R33: Petroleum storage or transfer facilities – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.10 Mobile sources.</b>	Amended		Part 1 Schedule 1		
	Rule R34: Mobile source emissions – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.11 Gas, water and wastewater processes.</b>	Amended/New		Part 1 Schedule 1		
	Rule R35: Water and wastewater processes – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R35A: Gas processes – permitted activity.	New	Select stance	Part 1 Schedule 1		
	<b>5.1.12 Drying and kiln processes.</b>	Amended		Part 1 Schedule 1		



	Rule R36: Drying and heating of minerals – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.13 Discharge of agrichemicals.</b>	Amended		Part 1 Schedule 1		
	General conditions for the discharge of agrichemicals.	Amended	Select stance	Part 1 Schedule 1		
	Rule R37: Handheld discharge of agrichemicals – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R38: Motorised and aerial discharge of agrichemicals – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R39: Agrichemicals not permitted – restricted discretionary activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.14 Fumigation.</b>	Amended		Part 1 Schedule 1		
	Rule R40: Fumigation – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.15 All other discharges</b>	Amended		Part 1 Schedule 1		
	Rule R42: All other discharges – discretionary activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.2 and 5.3 Discharges to land and water and land use rules</b>	Not applicable to Whaitua		Part 1 Schedule 1		
	Rule R48: Stormwater from an individual property – permitted activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R49: Stormwater from new subdivision and development – permitted activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R50: Stormwater from new subdivision and development – restricted discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R51: Stormwater to land – permitted activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R52: Stormwater from a local authority or state highway network – controlled activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R53: Stormwater from a local authority or state highway network with a stormwater management strategy – restricted discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R54: Stormwater from a port or airport – restricted discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R55: All other stormwater – discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R56: Water races – discretionary activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R57: Existing pumped drainage schemes – permitted activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R58: All other pumped drainage schemes – discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R65: Wastewater discharges to coastal and fresh water – discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R66: Discharges of wastewater to fresh water – non-complying activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R68: Discharge of treated wastewater from a wastewater network – restricted discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R101: Earthworks – permitted activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R102: Construction of a new farm track – permitted activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R103: Construction of a new farm track – controlled activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R104: Vegetation clearance on erosion prone land – permitted activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R105: Vegetation clearance on erosion prone land in accordance with a Freshwater Farm Plan – permitted activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R106: Earthworks and vegetation clearance for renewable energy generation – restricted discretionary activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R107: Earthworks and vegetation clearance – discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R110: Use of rural land in priority catchments – permitted activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R111: Use of rural land in priority catchments – controlled activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R112: Use of rural land in priority catchments – discretionary activity.	Not applicable to Whaitua	Select stance	Freshwater		
	<b>5.4.4 Uses of beds of lakes and rivers general conditions.</b>	Amended		Part 1 Schedule 1		
	Beds of lakes and rivers general conditions.	Amended	Amend	Part 1 Schedule 1	<i>Urgent works may not be able to wait for an ecologist's assessment, and if these need to wait days or weeks for this under proposed condition (n) may result in poor environmental outcomes. The plan needs to provide certainty around when urgent works can be conducted.</i>	Provide more certainty to plan users in general condition (n) so that a third party is not required to assess when named birds are identified as nesting, roosting and foraging, at the work site.
	<b>5.4.5 Uses of beds of lakes and rivers.</b>	Amended		Freshwater		
	Rule R128: New structures – permitted activity.	Amended	Amend	Freshwater	The inclusion of 'pipeline' removes 'pipes' from this Rule, as they have different dictionary definitions. Pipes have lesser effects than pipelines and should be specifically mentioned.	Refer to both pipes and pipelines.
	Rule R132: Minor sand and gravel extraction – permitted activity.	Amended	Select stance	Freshwater		
	Rule R133: Gravel extraction for flood protection purposes or erosion mitigation inside sites of significance – discretionary activity.	Amended	Select stance	Freshwater		
	<b>5.4.7 All other uses of the beds of lakes and rivers.</b>	Amended		Part 1 Schedule 1		

	Rule R145: All other uses of river and lake beds – discretionary activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.4.8 Damming and diverting water</b>	New		Freshwater		
	Rule R151A: Ongoing diversion of a river – permitted activity.	New	Select stance	Freshwater		
	<b>5.5 Water allocation rules</b>	Not applicable to Te Awarua-o-Porirua Whaitua		Freshwater		
	Rule R152: Take and use of water – permitted activity.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
	Rule R153: Farm dairy washdown and milk-cooling water – permitted activity.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
	Rule R154: Water races – permitted activity.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
	Rule R157: Take and use of water – controlled activity.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
	Rule R158: All other take and use – discretionary activity.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
<b>6 Other methods</b>	<b>6.16 Freshwater Action Plan programme</b>	New		Freshwater		
	Method M36: Freshwater Action Plan programme.	New	Select stance	Freshwater		
	Method M37: Freshwater Action Plan for the Parangarahu Lakes.	New	Select stance	Freshwater		
	Method M38: Freshwater Action Plan for the Rangitui catchment.	New	Select stance	Freshwater		
	Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Select stance	Part 1 Schedule 1		
	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
	Method M41: Identifying and responding to degradation in freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
	<b>6.17 Small farm property registration</b>	New		Freshwater		
	Method M42: Small farm property registration within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
	<b>6.16 Supporting improved water quality outcomes.</b>	New		Part 1 Schedule 1		
	Method M43: Supporting the health of urban waterbodies.	New	Amend	Part 1 Schedule 1	The reference to Wellington Water Limited may not be appropriate in the future (or in all locations). The reference should be updated to ensure it remains relevant.  A range of options should be provided for hydrological controls, not just tanks. It would also be helpful to confirm here the state of the environment monitoring and modelling that Greater Wellington will be undertaking (as this will, among other things, assist in informing the implementation of	Retain method with amendments. The reference to Wellington Water Limited should be removed and replaced with 'relevant water utility operator' or 'territorial authorities' 'water controlling authority' or similar. Remove reference to incentivising and research and development by other parties. Provide further options than tanks for hydrological controls.
	Method M44: Supporting the health of rural waterbodies.	New	Select stance	Part 1 Schedule 1		
	Method M45: Funding of wastewater and stormwater network upgrades	New	Select stance	Part 1 Schedule 1		
<b>8 Whaitua Te Whanganui-a-T</b>	<b>8.1 Objectives</b>	New		Both		
	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.	New	Select stance	Part 1 Schedule 1		
	Objective WH.O2: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora.	New	Select stance	Freshwater		
	Objective WH.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved to achieve the coastal water objectives set out in Table 8.1.	New	Select stance	Part 1 Schedule 1		
	Table 8.1 Coastal water objectives.	New	Select stance	Part 1 Schedule 1		
	Objective WH.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status.	New	Select stance	Part 1 Schedule 1		
	Objective WH.O5: By 2040 the health and wellbeing of the Parangarahu Lakes and associated natural wetlands are on a trajectory of improvement towards wai ora.	New	Select stance	Freshwater		
	Table 8.2 Target attribute states for lakes.	New	Select stance	Freshwater		
	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	New	Select stance	Freshwater		

	Objective WH.07: The physical integrity of aquifers is protected so that confined aquifer pressures are maintained.	New	Select stance	Freshwater		
	Objective WH.08: Primary contact sites within Te Awa Kairangi/Hutt River, Pākura River, Akatarawa River and Wainuiomata River are suitable for primary contact.	New	Select stance	Freshwater		
	Table 8.3 Primary contact site objectives in rivers.	New	Select stance	Freshwater		
	Objective WH.09: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	New	Select stance	Freshwater		
	Table 8.4: Target attribute states for rivers.	New	Oppose	Freshwater	<b>Suspended fine sediment/deposited fine sediment</b> There is uncertainty regarding the modelled correlation between sediment loads and visual clarity. SedNet is a national scale model which has had to be adjusted to the scale of the target TAS locations. This increased granularity may lead to higher levels of uncertainty.  Furthermore, sediment loads, visual clarity and deposited	Visual clarity and deposited sediment need to be set taking into consideration all contributing sediment sources, and the following points also need to be addressed: 1. How sediment load reductions will be measured in the future 2. How would proportionate contribution to sediment be measured and any reduction in this contribution be measured 3. How much time would the testing take, and who would a 'suitable person' be to conduct the testing? If we do not currently have personnel capacity to conduct this testing, is it wise to write it into the Plan?
	<b>8.2 Policies</b>	New		Both		
	Policy WH.P1: Improvement of aquatic ecosystem health.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P2: Management of activities to achieve target attribute states and coastal water objectives.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	New	Select stance	Freshwater		
	Policy WH.P4: Achievement of the visual clarity target attribute states.	New	Select stance	Freshwater		
	Table 8.5: Sediment load reductions required to achieve the visual clarity target attribute states.	New	Select stance	Freshwater		
	Policy WH.P5: Localised adverse effects of point source discharge.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P6: Cumulative adverse effects of point source discharges.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P7: Discharges to groundwater.	New	Select stance	Freshwater		
	Policy WH.P8: Avoiding discharges of specific products and waste.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P10: Managing adverse effects of stormwater discharges.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P12: Managing stormwater from a port or airport.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P17: General wastewater policy to achieve target attribute states and coastal objectives.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P18: Progressing works to meet Escherichia coli target attribute states.	New	Select stance	Freshwater		
	Policy WH.P19: Managing wastewater network catchment discharges.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P20: Managing existing wastewater treatment plant discharges.	New	Select stance	Part 1 Schedule 1		
	<b>8.2.4 Rural land use and earthworks</b>	New		Both		
	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	New	Select stance	Freshwater		
	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	New	Select stance	Freshwater		
	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	New	Select stance	Freshwater		
	Policy WH.P24: Phasing of farm environment plans.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P25: Managing rural land use change.	New	Select stance	Freshwater		
	Policy WH.P26: Managing livestock access to small rivers.	New	Select stance	Freshwater		
	Policy WH.P27: Promoting stream shading.	New	Select stance	Freshwater		
	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	New	Select stance	Freshwater		
	Policy WH.P29: Management of earthworks.	New	Support	Part 1 Schedule 1		

	Policy WH.P30: Discharge standard for earthworks.	New	Oppose	Part 1 Schedule 1	<p><i>Test methodologies should be appropriate to how monitoring occurs on site. Industry uses turbidity as a measure for earthworks consents, whereas Plan Change 1 specifies a measure of total suspended solids (to measure grams of sediment per m3).</i></p> <p><i>The issue with specifying 100g/m3 is that this is a lab test and will take 1-2 weeks to report a result – which is arbitrary because it is based on a</i></p>	The correct test methodology for earthworks is Nephelometric Turbidity Units (NTU), which still measures a point in time test but can be implemented in situ for real time testing. Real-time NTU testing is a much better test to use, as the Total Suspended Solids (TSS) g/m3 measure is purely a lab test doesn't correlate to the on-site measures. The plan should either not specify which sort of test is used and leave this to implementation guidance, or refer to the correct on-site test method.
	Policy WH.P31: Winter shut down of earthworks.	New	Oppose	Part 1 Schedule 1	<p><i>This policy reads as no winter works permits will be available. By the guidelines winter works permits is actually only for shutting a job down to make safe. The way this clause is written risks stopping ALL jobs in winter, and this needs clarification. A 'hard shutdown' over winter, where no winter earthworks permits are issued, will render civil construction and earthmoving companies unable to retain staff. By our (rough) estimate, more than 90 per cent of</i></p>	Delete policy WH.P31, which is excessive. Civil construction earthmoving companies will not be able to retain staff over a hard four month shut down. There need to be mechanisms where work can continue if sediment and soil runoff risks can be properly controlled, in particular on sand. If amend, ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'
	<b>8.2.5 Water allocation</b>	New		Freshwater		
	Policy WH.P32: Minimum flows and minimum water levels in Whaitua Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	Policy WH.P33: Core allocation in Whaitua Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	<b>8.3 Rules</b>	New		Both		
	<b>8.3.1 Discharges of contaminants</b>	New		Part 1 Schedule 1		
	Rule WH.R1: Point source discharges of specific contaminants – prohibited activity.	New	Select stance	Part 1 Schedule 1		
	<b>8.3.2 Stormwater</b>	New		Both		
	Rule WH.R2: Stormwater to land – permitted activity.	New	Select stance	Freshwater		
	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water – permitted activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity.	New	Amend	Part 1 Schedule 1	<p>(f) and (g) should not be occurring even if they are via the stormwater network and that it is the landowners responsibility to resolve. Wording of this rule suggests that it is not the landowner's concern.</p>	<p>Amend Rule as follows: ... <del>and where the discharge is not via an existing local authority stormwater network the discharge shall also not:</del></p>
	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	New	Amend	Part 1 Schedule 1	<p>Clause (c) is too vague as it does not specify what the hydrological controls have to achieve.</p> <p>(f) and (g) should not be occurring even if they are via the stormwater network and that it is the landowners responsibility to resolve. Wording of this rule suggests that it is not the landowners concern.</p>	<p>Greater specificity in clause (c), including a requirement to retain a specific depth of rainfall.</p> <p>Delete the following clause: <del>and where the discharge is not via an existing local authority stormwater network the discharge shall also not:</del></p>
	Rule WH.R6: Stormwater from new greenfield impervious surfaces – controlled activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas – controlled activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R8: Stormwater from a port or airport – restricted discretionary activity.	New	Select stance	Part 1 Schedule 1		

	Rule WH.R9: Stormwater from a local authority or state highway network—restricted discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R10: Stormwater from new state highways—discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces – discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R12: All other stormwater discharges – non-complying activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R13: Stormwater from new unplanned greenfield development – prohibited activity.	New	Select stance	Part 1 Schedule 1		
	<b>8.3.3 Wastewater</b>	<b>New</b>		<b>Part 1 Schedule 1</b>		
	Rule WH.R14: Wastewater network catchment discharges – restricted discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R15: Existing wastewater discharges from a treatment plant – discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R16: All other discharges of wastewater – non-complying activity.	New	Select stance	Part 1 Schedule 1		
	<b>8.3.4 Land uses</b>	<b>New</b>		<b>Freshwater</b>		
	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	New	Select stance	Freshwater		
	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	New	Support	Freshwater	<i>We support good sediment control, but provide the caveat that some engagement with contractors responsible for vegetation clearance should be undertaken by GWRC to clarify their responsibilities under the new plan. If sediment control plans now need to be submitted for these activities, GWRC should work with industry bodies to compose and circulate good information on how to compose and submit such plans. CCNZ is happy to engage</i>	
	Rule WH.R19: Vegetation clearance – discretionary activity.	New	Select stance	Freshwater	<i>We support good sediment control, but provide the caveat that some engagement with contractors responsible for vegetation clearance should be undertaken by GWRC to clarify their responsibilities under the new plan. If sediment control plans now need to be submitted for these activities, GWRC should work with industry bodies to compose and circulate good information on how to compose and submit such plans. CCNZ is happy to engage</i>	
	Rule WH.R20: Plantation forestry – controlled activity.	New	Select stance	Freshwater		
	Rule WH.R21: Plantation forestry – discretionary activity.	New	Select stance	Freshwater		
	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.	New	Select stance	Freshwater		
	<b>8.3.5 Earthworks</b>	<b>New</b>		<b>Both</b>		

	Rule WH.R23: Earthworks – permitted activity.	New	Amend	Freshwater	As discussed in relation to the earthworks definition, many earthworks activities undertaken by contractors working for local authority transport teams and Waka Kotahi NZ Transport Agency with significant public benefits, but minor effects would be unable to meet the permitted activity conditions of proposed Rule WH.R23. This includes minor repairs and maintenance of three waters infrastructure.  Activities such as	Amend Rule WH.R23, (Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua) to reinstate the exemptions for certain earthworks activities as exist for 'other Whaitua', including for the thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines. Any consequential amendments, to other relevant provisions, which are in general accordance with this request.
	Rule WH.R24: Earthworks – restricted discretionary activity.	New	Amend	Part 1 Schedule 1	<i>The hard shutdown of earthworks between 1 June and 30 September is inappropriate, and CCNZ strongly opposes this as many works may be able to continue during this period with no adverse effects, if good sediment control measures are put in place. Also, test methodologies should be appropriate to how monitoring occurs on site. Industry uses turbidity as a measure for earthworks consents, whereas Plan Change 1 specifies a</i>	Amend policy WH.R24 (b), which is excessive. Earthmoving companies will not be able to retain staff over a hard four month shut down. There should be good professional standards around sediment control when earthmoving, and there should be mechanisms where work can continue if sediment and soil runoff risks can be properly controlled, in particular on sand. If amend, ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'. This matter needs significantly more attention as a hard shut down of earthworks is not good enough and this can be better managed to maximise positive effects and minimise impacts on professional earthmoving businesses.  Regarding test methodology, the correct test methodology for earthworks is Nephelometric Turbidity Units (NTU), which still measures a point in time test but can be implemented in situ for real time testing. Real-time NTU testing is a much better test to use, as the Total Suspended Solids (TSS) g/m3 measure is purely a lab test doesn't correlate to the on-site measures. The plan should either not specify which sort of test is used and leave this to implementation guidance, or refer to the correct on-site test method.
	Rule WH.R25: Earthworks – non-complying activity.	New	Select stance	Part 1 Schedule 1		
	<b>8.3.6 Nutrients and sediment from pastoral farming</b>	New		Freshwater		
	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares – permitted activity.	New	Select stance	Freshwater		
	Rule WH.R27: Farming activities on 20 hectares or more of land – permitted activity.	New	Select stance	Freshwater		
	Table 8.6: Phase-in of farm environment plans for part Freshwater Management Units.	New	Select stance	Freshwater		
	Rule WH.R28: Livestock access to a small river – permitted activity.	New	Select stance	Freshwater		
	Rule WH.R29: Livestock access to a small river – discretionary activity.	New	Select stance	Freshwater		
	Rule WH.R30: The use of land for farming activities – discretionary activity.	New	Select stance	Freshwater		
	Rule WH.R31: Change of rural land use – discretionary activity.	New	Select stance	Freshwater		
	Rule WH.R32: Farming activities – non-complying activity.	New	Select stance	Freshwater		
	<b>8.3.7 Take and use of water</b>	New		Freshwater		
	Rule WH.R33: Take and use of water in the Whaitua Te Whanganui-a-Tara – restricted discretionary activity.	New	Amend	Freshwater	<i>This needs to be amended to better allow for water take in relation to dust control, emergency works and other civil construction activities.</i>	Amend to consider use of standpipes, water use on infrastructure projects and emergency water take
	Rule WH.R34: Take and use of water in the Whaitua Te Whanganui-a-Tara – discretionary activity.	Amended	Select stance	Freshwater	<i>This needs to be amended to better allow for water take in relation to dust control, emergency works and other civil construction activities.</i>	Amend to consider use of standpipes, water use on infrastructure projects and emergency water take
	Rule WH.R35: Take and use of water from outstanding rivers or lakes – non-complying activity.	Amended	Select stance	Freshwater	<i>This needs to be amended to better allow for water take in relation to dust control, emergency works and other civil construction activities.</i>	Amend to consider use of standpipes, water use on infrastructure projects and emergency water take

	Rule WH.R36: Take and use of water exceeding minimum flows or core allocation – prohibited activity.	Amended	Select stance	Freshwater	<i>This needs to be amended to better allow for water take in relation to dust control, emergency works and other civil construction activities.</i>	Amend to consider use of standpipes, water use on infrastructure projects and emergency water take
	Table 8.7: Minimum flows for rivers in the Whaitua Te Whanganui-a-Tara.	Amended	Select stance	Freshwater		
	Table 8.8: Surface water allocation amounts for rivers and Category A groundwater and Category B groundwater in the Te Awa Kairangi/Hutt River, Wainuiomata River and Ōrongorongo River catchments.	Amended	Select stance	Freshwater		
	Table 8.9: Groundwater allocation amounts for Category B groundwater and Category C groundwater in the Whaitua Te Whanganui-a-Tara.	Amended	Select stance	Freshwater		
	Figure 8.1: Te Awa Kairangi / Hutt River and Upper Hutt groundwater in Tables 8.8 and 8.9.	Amended	Select stance	Freshwater		
	Figure 8.2: Te Awa Kairangi / Hutt River and Lower Hutt groundwater in Tables 8.8 and 8.9.	Amended	Select stance	Freshwater		
<b>Chapter 9 Te Awarua-o-Porirua Whaitua</b>	<b>9.1 Objectives</b>	New		Both		
	Objective P.O1: The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100.	New	Select stance	Part 1 Schedule 1		
	Objective P.O2: Te Awarua-o-Porirua's groundwater, rivers, lakes and natural wetlands, and their margins are on a trajectory of measurable improvement towards wai ora.	New	Select stance	Freshwater		
	Objective P.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Pāuatahanui Inlet, Onepoto Arm and the open coastal areas of Te Awarua-o-Porirua is maintained or improved to achieve the coastal water objectives set out in Table 9.1.	New	Select stance	Part 1 Schedule 1		
	Table 9.1: Coastal water objectives.	New	Select stance	Part 1 Schedule 1		
	Objective P.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased, and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status.	New	Select stance	Part 1 Schedule 1		
	Objective P.O5: Groundwater flows and levels, and water quality, are maintained.	New	Select stance	Freshwater		
	Objective P.O6: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	New	Select stance	Freshwater		
	Table 9.2: Target attribute states for rivers.	New	Select stance	Freshwater		
	<b>9.2 Policies</b>	New		Both		
	<b>9.2.1 Ecosystem health and water quality</b>	New		Both		
	Policy P.P1: Improvement of aquatic ecosystem health.	New	Select stance	Part 1 Schedule 1		
	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	New	Select stance	Part 1 Schedule 1		
	Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	New	Select stance	Freshwater		
	Policy P.P4: Contaminant load reductions.	New	Select stance	Part 1 Schedule 1		
	Table 9.3: Harbour arm catchment contaminant load reductions.	New	Select stance	Part 1 Schedule 1		
	Table 9.4: Part Freshwater Management Unit sediment load reductions required to achieve the visual clarity target attribute state.	New	Select stance	Part 1 Schedule 1		
	<b>8.2.1 Discharges to water</b>	New		Both		
	Policy P.P5: Localised adverse effects of point source discharges.	New	Select stance	Part 1 Schedule 1		
	Policy P.P6: Point source discharges.	New	Select stance	Part 1 Schedule 1		
	Policy P.P7 Discharges to groundwater.	New	Select stance	Freshwater		
	Policy P.P8 Avoiding discharges of specific products and waste.	New	Select stance	Part 1 Schedule 1		
	<b>9.2.2 Stormwater</b>	New		Part 1 Schedule 1		
	Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	New	Select stance	Part 1 Schedule 1		
	Policy P.P10: Managing adverse effects of stormwater discharges.	New	Select stance	Part 1 Schedule 1		
	Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises.	New	Select stance	Part 1 Schedule 1		
	Policy P.P12: Managing stormwater network discharges through a Stormwater Management Strategy.	New	Select stance	Part 1 Schedule 1		
	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	New	Select stance	Part 1 Schedule 1		
	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	New	Select stance	Part 1 Schedule 1		
	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	New	Select stance	Part 1 Schedule 1		
	<b>9.2.3 Wastewater</b>	New		Both		
	Policy P.P16: General wastewater policy to achieve target attribute states and coastal water objectives.	New	Select stance	Part 1 Schedule 1		
	Policy P.P17: Progressing works to meet Escherichia coli target attribute states.	New	Select stance	Freshwater		
	Policy P.P18: Managing wastewater network catchment discharges.	New	Select stance	Part 1 Schedule 1		
	Policy P.P19: Managing existing wastewater treatment plant discharges.	New	Select stance	Part 1 Schedule 1		

	<b>9.2.4 Rural Land Uses and Earthworks</b>	New		Both		
	Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	New	Select stance	Freshwater		
	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	New	Select stance	Freshwater		
	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	New	Select stance	Freshwater		
	Policy P.P23: Phasing of farm environment plans.	New	Select stance	Freshwater		
	Policy P.P24: Managing rural land use change.	New	Select stance	Freshwater		
	Policy P.P25: Promoting stream shading.	New	Select stance	Freshwater		
	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	New	Select stance	Freshwater		
	Policy P.P27: Management of earthworks sites.	New	Select stance	Part 1 Schedule 1		
	Policy P.P28: Discharge standard for earthworks sites.	New	Select stance	Part 1 Schedule 1	<p><i>Also, test methodologies should be appropriate to how monitoring occurs on site. Industry uses turbidity as a measure for earthworks consents, whereas Plan Change 1 specifies a measure of total suspended solids (to measure grams of sediment per m3).</i></p> <p><i>The issue with specifying 100g/m3 is that this is a lab test and will take 1-2 weeks to report a result – which is arbitrary because it is based on a</i></p>	Regarding test methodology, the correct test methodology for earthworks is Nephelometric Turbidity Units (NTU), which still measures a point in time test but can be implemented in situ for real time testing. Real-time NTU testing is a much better test to use, as the Total Suspended Solids (TSS) g/m3 measure is purely a lab test doesn't correlate to the on-site measures. The plan should either not specify which sort of test is used and leave this to implementation guidance, or refer to the correct on-site test method. Consider removal or shifting to an acceptable monthly/annual average rather than a 'point in time' measure that lacks meaning.
	Policy P.P29: Winter shut down of earthworks.	New	Amend	Part 1 Schedule 1	<p><i>A complete hard shutdown of earthworks between 1 June and 30 September is inappropriate, and CCNZ strongly opposes this as many works may be able to continue during this period with no adverse effects, if good sediment control measures are put in place.</i></p>	Amend policy P.P29 (a), which is excessive. Earthmoving companies will not be ab
	<b>9.2.5 Water allocation</b>	Amended/New		Freshwater		
	Policy P.P30: Minimum flows and minimum water levels in Te Awarua-o-Porirua Whaitua.	Amended	Select stance	Freshwater		
	Policy P.P31: Water takes at minimum flows and minimum water levels.	New	Select stance	Freshwater		
	Policy P.P32: Allocation in the Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
	<b>9.3 Rules</b>	New		Both		
	<b>9.3.1 Discharges of contaminants</b>	New		Both		
	Rule P.R1: Point source discharges of specific contaminants – prohibited activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R2: Stormwater to land – permitted activity.	New	Select stance	Freshwater		
	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water – permitted activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R6: Stormwater from new greenfield impervious surfaces – controlled activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas – controlled activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R8: Stormwater from a local authority or state highway network – restricted discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R9: Stormwater from new state highways – discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R10: Stormwater from new and redeveloped impervious surfaces – discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R11: All other stormwater discharges – non-complying activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R12 – Stormwater discharges from new unplanned greenfield development – prohibited activity.	New	Select stance	Part 1 Schedule 1		
	<b>9.3.3 Wastewater</b>	New		Part 1 Schedule 1		
	Rule P.R13: Wastewater network catchment discharges to water – restricted discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R14: Existing wastewater discharges from a treatment plant to coastal and freshwater – discretionary activity.	New	Select stance	Part 1 Schedule 1		



	Rule P.R15: All other discharges of wastewater – non-complying activity.	New	Select stance	Part 1 Schedule 1		
	<b>9.3.4 Land uses</b>	New		Freshwater		
	Rule P.R16: Vegetation clearance on highest erosion risk land– permitted activity.	New	Select stance	Freshwater		
	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.	New	Select stance	Freshwater		
	Rule P.R18: Vegetation clearance – discretionary activity.	New	Select stance	Freshwater		
	Rule P.R19: Plantation forestry – controlled activity.	New	Select stance	Freshwater		
	Rule P.R20: Plantation forestry – discretionary activity.	New	Select stance	Freshwater		
	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.	New	Select stance	Freshwater		
	<b>9.3.5 Earthworks</b>	New		Both		
	Rule P.R22: Earthworks – permitted activity.	New	Select stance	Freshwater	As discussed in relation to the earthworks definition, many earthworks activities undertaken by contractors working for local authority transport teams and Waka Kotahi NZ Transport Agency with significant public benefits, but minor effects would be unable to meet the permitted activity conditions of proposed Rule P.R22. This includes minor repairs and maintenance of three waters infrastructure.  Activities such as	Amend the definition of earthworks that governs Rule P.R22, to reinstate the exemptions for certain earthworks activities as exist for 'other Whaitua', including for the thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines. Any consequential amendments, to other relevant provisions, which are in general accordance with this request.
	Rule P.R23: Earthworks – restricted discretionary activity.	New	Select stance	Part 1 Schedule 1	<i>The hard shutdown of earthworks between 1 June and 30 September is inappropriate, and CCNZ strongly opposes this as many works may be able to continue during this period with no adverse effects, if good sediment control measures are put in place. Also, test methodologies should be appropriate to how monitoring occurs on site. Industry uses turbidity as a measure for earthworks consents, whereas Plan Change 1 specifies a</i>	Amend policy P.R23 (b), which is excessive. Earthmoving companies will not be able to retain staff over a hard four month shut down. There should be good professional standards around sediment control when earthmoving, and there should be mechanisms where work can continue if sediment and soil runoff risks can be properly controlled, in particular on sand. If amend, ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'. This matter needs significantly more attention as a hard shut down of earthworks is not good enough and this can be better managed to maximise positive effects and minimise impacts on professional earthmoving businesses.  Regarding the test methodology described in (a), the correct test methodology for earthworks is Nephelometric Turbidity Units (NTU), which still measures a point in time test but can be implemented in situ for real time testing. NTU testing is a much better test to use, as the Total Suspended Solids (TSS) g/m3 measure is purely a lab test doesn't correlate to the on-site measures, and will add significant off-site time and cost to projects. The plan should either not specify which sort of test is used and leave this to implementation guidance, or refer to the correct on-site test method.
	Rule P.R24: Earthworks – non-complying activity.	New	Select stance	Part 1 Schedule 1		
	<b>9.3.6 Nutrients and sediment from pastoral farming</b>	New		Freshwater		
	Rule P.R25: Farming activities on properties of between 4 hectares and 20 hectares – permitted activity.	New	Select stance	Freshwater		
	Rule P.R26: Farming activities on 20 hectares or more of land – permitted activity.	New	Select stance	Freshwater		
	Table 9.5: Phase in of farm environment plans for Part Freshwater Management Units.	New	Select stance	Freshwater		
	Rule P.R27: The use of land for farming activities – discretionary activity.	New	Select stance	Freshwater		
	Rule P.R28: Change of rural land use – discretionary activity.	New	Select stance	Freshwater		
	Rule P.R29: Farming activities – non-complying activity.	New	Select stance	Freshwater		
	<b>9.3.7 Take and use of water</b>	New		Freshwater		
	Rule P.R30: Take and use of water – permitted activity.	New	Select stance	Freshwater	<i>This needs to be amended to better allow for water take in relation to dust control, emergency works and other civil construction activities.</i>	Amend to consider use of standpipes, water use on infrastructure projects and emergency water take
	Rule P.R31: Take and use of water – restricted discretionary activity.	New	Select stance	Freshwater	<i>This needs to be amended to better allow for water take in relation to dust control, emergency works and other civil construction activities.</i>	Amend to consider use of standpipes, water use on infrastructure projects and emergency water take

	Rule P.R32: Take and use of water – discretionary activity.	New	Select stance	Freshwater	<i>This needs to be amended to better allow for water take in relation to dust control, emergency works and other civil construction activities.</i>	Amend to consider use of standpipes, water use on infrastructure projects and emergency water take
	Rule P.R33: Taking and use of water that exceeds minimum flows or allocation amounts – prohibited activity.	New	Select stance	Freshwater	<i>This needs to be amended to better allow for water take in relation to dust control, emergency works and other civil construction activities.</i>	Amend to consider use of standpipes, water use on infrastructure projects and emergency water take
	Table 9.6: Minimum flows for Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
	Table 9.7: Surface water allocation amounts for Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
<b>12 Schedules</b>		<b>Amended/New</b>		<b>Both</b>		
	Schedule A: Outstanding water bodies	New	Select stance	Part 1 Schedule 1		
	Schedule A2: Lakes with outstanding indigenous ecosystem values.	New	Select stance	Part 1 Schedule 1		
	Schedule F: Ecosystems and habitats with significant indigenous biodiversity values.	Amended	Select stance	Part 1 Schedule 1		
	Schedule F1: Rivers and lakes with significant indigenous ecosystems.	Amended	Select stance	Part 1 Schedule 1		
	Schedule F2a: Significant habitats for indigenous birds in rivers.	Amended	Select stance	Part 1 Schedule 1		
	Schedule F2b: Significant habitats for indigenous birds in lakes.	Amended	Select stance	Part 1 Schedule 1		
	Schedule F2c: Significant habitats for indigenous birds in the coastal marine area.	Amended	Select stance	Part 1 Schedule 1		
	Schedule F4: Sites with significant indigenous biodiversity values in the coastal marine area.	Amended	Select stance	Part 1 Schedule 1		
	Schedule F5: Habitats with significant indigenous biodiversity values in the coastal marine area.	Amended	Select stance	Part 1 Schedule 1		
	Schedule 27: Freshwater Action Plan requirements.	New	Select stance	Part 1 Schedule 1		
	A Freshwater Action Plans	New	Select stance	Freshwater		
	A1 Purpose	New	Select stance	Freshwater		
	A2 Freshwater Action Plans required in Whaitua Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	A3 Freshwater Action Plans required in Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
	B Freshwater Action Plan requirements.	New	Select stance	Freshwater		
	B1. Principles.	New	Select stance	Freshwater		
	B2. General Content.	New	Select stance	Freshwater		
	B3 Necessary actions.	New	Select stance	Freshwater		
	C. Freshwater Action Plans in Whaitua Te Whanganui-a-Tara	New	Select stance	Freshwater		
	D Freshwater Action Plans in Te Awarua-o-Porirua Whaitua	New	Select stance	Freshwater		
	Schedule 28: Stormwater Contaminant Treatment.	New	Select stance	Part 1 Schedule 1		
	Table 1: Target load Reductions for Copper and Zinc	New	Select stance	Part 1 Schedule 1		
	Table 2: Additional Devices and Specified Load Reductions for Copper and Zinc	New	Select stance	Part 1 Schedule 1		
	Schedule 29: Stormwater Impact Assessments.	New	Select stance	Part 1 Schedule 1		
	Schedule 30: Financial Contributions.	New	Select stance	Part 1 Schedule 1		
	A Context	New	Select stance	Part 1 Schedule 1		
	B Purpose	New	Select stance	Part 1 Schedule 1		
	C Definition of an Equivalent Household Unit	New	Select stance	Part 1 Schedule 1		
	D Calculation of level of contribution	New	Select stance	Part 1 Schedule 1		
	Table D1. Financial contribution calculations for residential greenfield development	New	Select stance	Part 1 Schedule 1		
	Table D2. Financial contribution calculations for non-residential greenfield development and new roads/state highways	New	Select stance	Part 1 Schedule 1		
	E Use	New	Select stance	Part 1 Schedule 1		
	Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	New	Select stance	Part 1 Schedule 1		
	Schedule 32: Wastewater Network Catchment Improvement Strategy.	New	Select stance	Part 1 Schedule 1		
	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	New	Select stance	Freshwater		
	A Purposes of the Erosion and Sediment Management Plan	New	Select stance	Freshwater		
	B Management objectives	New	Select stance	Freshwater		
	C Requirements of the Erosion and Sediment Management Plan	New	Select stance	Freshwater		
	C1 Contents of the Erosion and Sediment Management Plan	New	Select stance	Freshwater		
	D Amendment of Erosion and Sediment Management Plan	New	Select stance	Freshwater		
	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	New	Select stance	Freshwater		
	A Purpose of the Erosion and Sediment Management Plan	New	Select stance	Freshwater		
	B Management objectives	New	Select stance	Freshwater		
	C Requirements of the Erosion and Sediment Management Plan	New	Select stance	Freshwater		
	C1 Contents of the Erosion and Sediment Management Plan	New	Select stance	Freshwater		
	C2 Certification of the Erosion and Sediment Management Plan	New	Select stance	Freshwater		
	D Amendment of Erosion and Sediment Management Plan	New	Select stance	Freshwater		
	Schedule 35: Small farm registration.	New	Select stance	Freshwater		
	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		

	A Certification requirements under the Resource Management (Freshwater Farm Plans) Regulations 2023.	New	Select stance	Freshwater		
	B Management objectives.	New	Select stance	Freshwater		
	C Content of a farm environment plan.	New	Select stance	Freshwater		
	D Risk assessment and mitigation to address risk.	New	Select stance	Freshwater		
	Table D1 Sediment loss and transport risk factors	New	Select stance	Freshwater		
	E Erosion Risk Treatment Plan.	New	Select stance	Freshwater		
	F Small stream riparian programme.	New	Select stance	Freshwater		
<b>13 Maps</b>		New		Both		
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4).	New	Select stance	Part 1 Schedule 1		
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 1: (Kāpiti).	New	Select stance	Part 1 Schedule 1		
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 2: (Wellington Harbour).	New	Select stance	Part 1 Schedule 1		
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 2: Te Awarua-o-Porirua.	New	Select stance	Part 1 Schedule 1		
	Map 77: Habitats of nationally threatened freshwater species – Te Awarua-o-Porirua and Te Whanganui-a-Tara (Schedule F1).	New	Select stance	Part 1 Schedule 1		
	Map 78: Part freshwater management units and target attribute state sites (rivers) – Te Awarua-o-Porirua.	New	Select stance	Freshwater		
	Map 79: Part freshwater management units and target attribute state sites (rivers) – Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	Map 80: Part freshwater management units and target attribute state sites (lakes) – Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	Map 81: Rivers and catchment management units for water takes – Te Awarua-o-Porirua.	New	Select stance	Freshwater		
	Map 82: Coastal water management units – Te Awarua-o-Porirua.	New	Select stance	Part 1 Schedule 1		
	Map 83: Coastal water management units – Te Whanganui-a-Tara.	New	Select stance	Part 1 Schedule 1		
	Map 84: Harbour arm catchments – Te Awarua-o-Porirua.	New	Select stance	Part 1 Schedule 1		
	Map 85: Primary contact sites – Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	Map 86: Unplanned greenfield areas – Porirua City Council.	New	Select stance	Part 1 Schedule 1		
	Map 87: Unplanned greenfield areas – Wellington City Council.	New	Select stance	Part 1 Schedule 1		
	Map 88: Unplanned greenfield areas – Upper Hutt City Council.	New	Select stance	Part 1 Schedule 1		
	Map 89: Unplanned greenfield areas – Hutt City Council.	New	Select stance	Part 1 Schedule 1		
	Map 90: Highest and high erosion risk land (Pasture) – Te Awarua-o-Porirua.	New	Select stance	Freshwater		
	Map 91: Highest erosion risk land (Woody vegetation) – Te Awarua-o-Porirua.	New	Select stance	Freshwater		
	Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua.	New	Select stance	Freshwater		
	Map 93: Highest and high erosion risk land (Pasture) – Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	Map 94: Highest erosion risk land (Woody vegetation/clearance) – Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	Map 96: Mākara catchment.	New	Select stance	Freshwater		
	Map 97: Mangaroa catchment.	New	Select stance	Freshwater		