Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)

Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

Who can make a Further Submission?

A Further Submission may be made by any person who:

- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the Natural Resources Plan, Plan Change 1 and on the consultation and submission processes please visit our website.

How to make a Further Submission:

1. You can use the online submission portal; or
2. You can use the Further Submission Form(s) (Form 6).

- This Further Submission Form(s) (Form 6) – Microsoft Word version; or
- Further Submission Form(s) (Form 6) – Microsoft Excel version.

  Please send the Further Submission Form in by one of the below methods:
  - Email it to the regionalplan@gw.govt.nz.
  - Post it to: PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Advisor.
  - Drop it off at reception at one of our offices, marked ATT: Hearings Advisor.

Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.

Further Submission Form requirements:

- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter.

  Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our website. If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
Name of Submitter: (First and last name, or organisation / company)	Orogen Limited
Address for service: (Email, or physical address) Please note an email address is the preferred method	darcy.brittliff@orogen.nz
Phone: (Optional)	N/A
Contact person for submission: (If different to above)	Darcy Brittliff or Ants Ransley
I wish to be heard in support of my submission at a hearing:	No

I would consider presenting a joint case at the hearing with others who make a similar submission:	No
2. Criteria applicable to Further Submitter:	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	Yes
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
C) I am the local authority for the relevant area.	No
Specify the reasoning behind why you qualify for either of these above options:	We are an active Professional Services company applying for, managing, and reporting compliance for Regional Consents.

3. For the further submitter to action

Service of your further submission:

Please note that any person making a further submission **must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington**.

Each submitter has an address for service available at: www.gw.govt.nz/nrp-pc1-submissions.
If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

4. Disclosures:		
If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation	[redacted]	8th March 2024

Public information:
Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website.
In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the Plan Change 1 to the Natural Resources Plan Information Statement.
You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at privacy@gw.govt.nz.

5. Further Submission:

- The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested:
  - NRP PC 1 - Summary of Decisions Requested – By Submitter
  - NRP PC 1 - Summary of Decisions Requested – By Provision
- Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.
- If you are providing suggested text amendments to a provision, please do so in the following format:
  Suggested added text, shown as **bolded text** format
  Suggested deleted text, shown as ~~strikethrough~~ format

Please enter further submission points in the table on the following page(s)

4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

*Submitter name or, Submitter number of the submission you are commenting on:	*Submission point number: Unique identifying number allocated to each specific submission point, located in the second column of the summary of decisions requested table:	*Stance on the submission point: (Support, Oppose, Oppose in part, Support in part, Not stated)	*Decision sought: (Allow, Disallow, Allow in part, or Disallow in part)	Decision sought Illustrate which aspects of this original submission that you support or oppose. Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.	Reasons: Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.
Carrus Corporation Ltd	S247.001	Support	Allow submission	Provide a definition for '*Greenfields*' development.	Refer Orogen S239.002
Carrus Corporation Ltd	S247.004	Support in Part	Allow submission	Withdraw PC1 and provide a consultation path to establish a workable NRP as sought by the submitter.	PC1 presents unworkable policies listed in our original decision. The impact of PC1 on the civil construction sector and the development community have not been considered.
Carrus Corporation Ltd	S247.007	Support	Allow submission	Adopt requested decision.	To provide for sensible alignment of small development/ building regulations
Carrus Corporation Ltd	S247.008	Support	Allow submission	Adopt submission to enable smaller greenfield developments	Refer to Orogen submission points S239.008 & S239.016. Smaller greenfield developments can be appropriately designed to manage all effects and therefore should be considered on their merits.

					A planning pathway needs to be enabled through PC1 for such developments.
Carrus Corporation Ltd	S247.009, S247.019, & S247.021	Support	Allow submission	Adopt submission to enable unplanned greenfield development.	Refer to Orogen submission point S239.008 & S239.016 Greenfield developments can be appropriately designed to manage all effects and therefore should be considered on their merits. A planning pathway needs to be enabled through PC1 for such developments.
Carrus Corporation Ltd	S247.011	Support	Allow submission	Delete policy.	Greenfield developments can be designed to have effective stormwater management systems. This policy does not enable modern stormwater engineering consideration greenfield development.
Carrus Corporation Ltd	S247.012, S247.020 & S247.025	Support	Allow submission	Delete policies and amend related rules.	Refer to Orogen submission S239.004 & S239.012 Winter works is currently effectively managed through current sediment control practices and winter approval procedures. High rainfall events that provide risk to the environment occur outside of

					the winter period which negate this policy. By the earthworks definition this policy impacts on all civil activities in the region and would cripple the civil industry. It needs to be removed as the environmental risks are effectively managed by industry best practice.
***Submitter name or, Submitter number of the submission you are commenting on:**	****Submission point number:***	***Stance on the submission point:**	***Decision sought:**	**Decision sought:**	**Reasons:**
Civil Contractors New Zealand (CCNZ)	S285.001	Support	Allow submission	Withdraw PC1 and provide a consultation path to establish a workable NRP as sought by the submitter. Withdraw PC1 and provide a consultation path for a workable NRP.	The blanket policies ceasing winter works, influencing cleanfill, influencing stormwater will create greater costs for consenting and delivery as a short active construction year is now imposed by PC1 following a longer more complex planning pathway. The industry is effective with environmental management. Consultation will enable stronger policies to be established than the blanket detrimental policy in PC1. A risk based approached to earthworks provides a better

					outcome for industry and compliance.
Civil Contractors New Zealand (CCNZ)	S285.003	Support	Allow submission	Regional enablement and planning is required to provide for Cleanfill, quarry, and landfill in the region.	Cleanfill supports all aspects of the civil and building industry. Current rules and policies regarding Cleanfill have resulted in projects carting surplus material as far as Fielding from Wellington. The impact on our carbon footprint and transport network from this behavior is not desired by anyone.
Civil Contractors New Zealand (CCNZ)	S285.006	Support	Allow submission in part	Review definition of '*earthworks'*.	See Orogen submission point S239.003 The point here from CCNZ reinforces our points that PC1 introduces ambiguity and real cost implications to industry and our society.
Civil Contractors New Zealand (CCNZ)	S285.025, S285.030, S285.031 & S285.033	Support	Allow submission	Delete policy and amend associated rules.	Refer to Orogen submission S239.004, S239.011, S239.012 & S239.019 A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approached to earthworks provides a better outcome for industry and compliance.

Civil Contractors New Zealand (CCNZ)	S285.024 & S285.032	Support	Allow submission	Review definition of '*earthworks*' as it applies to these rules.	See Orogen submission point S239.003
***Submitter name or, Submitter number of the submission you are commenting on:**	***Submission point number:**	***Stance on the submission point:**	***Decision sought:**	**Decision sought:**	**Reasons:**
Cuttriss Consultants Ltd	S219.001	Support	Allow submission	Provide a definition for '*Greenfields*' development.	Refer Orogen S239.002
Cuttriss Consultants Ltd	S219.004	Support	Allow submission	Withdraw PC1 and provide a consultation path to establish a workable NRP as sought by the submitter.	PC1 presents unworkable policies listed in our original decision. The impact of PC1 on the civil construction sector and the development community have not been considered.
Cuttriss Consultants Ltd	S219.005	Support	Allow submission	Withdraw PC1 until the NPS-FM is resolved and provide clear alignment.	Inconsistency to NPS-FM provides conflict in project planning between PC1 & NPS-FM.
Cuttriss Consultants Ltd	S219.007	Support	Allow submission	Adopt requested decision.	To provide for sensible alignment of small development/ building regulations
Cuttriss Consultants Ltd	S219.008, S219.009, S219.019 & S219.021	Support	Allow submission	Adopt submission to enable unplanned greenfield development.	Refer to Orogen submission point S239.008 & S239.016 Greenfield developments can be appropriately designed to manage all effects and therefore should be considered on their merits. A planning pathway needs to be enabled through PC1 for such developments.

Cuttriss Consultants Ltd	S219.012, S219.020, S219.025 & S219.031	Support	Allow submission	Delete policy and amend associated rules.	Refer to Orogen submission S239.004, S239.011, S239.012 & S239.019 A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approached to earthworks provides a better outcome for industry and compliance.
***Submitter name or, Submitter number of the submission you are commenting on:**	****Submission point number:***	***Stance on the submission point:**	***Decision sought:**	**Decision sought:**	**Reasons:**
Woodridge Holdings Limited	S255.001	Support	Allow submission	Withdraw PC1 and provide a consultation path to establish a workable NRP as sought by the submitter.	Withdraw PC1 and provide a consultation path to establish a workable NRP as sought by the submitter.
Woodridge Holdings Limited	S255.030, S255.036, S255.048 & S255.062	Support	Allow submission	Adopt submission to enable unplanned greenfield development.	Refer to Orogen submission point S239.008 & S239.016 Greenfield developments can be appropriately designed to manage all effects and therefore should be considered on their merits. A planning pathway needs to be enabled through PC1 for such developments.
Woodridge Holdings Limited	S255.031 & S255.051	Support	Allow submission	Delete policy and amend associated rules.	Refer to Orogen submission S239.004, S239.011, S239.012 & S239.019

					A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approached to earthworks provides a better outcome for industry and compliance.
Woodridge Holdings Limited	S255.037 & S255.038	Support	Allow submission	Adopt submission to review stormwater discharge standards and redraft PC1	See Orogen submission point S239.009
Woodridge Holdings Limited	S255.039 & S255.074	Support	Allow submission	Delete policy and amend associated rules.	Refer to Orogen submission S239.004, S239.011, S239.012 & S239.019 A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approached to earthworks provides a better outcome for industry and compliance.
***Submitter name or, Submitter number of the submission you are commenting on:**	****Submission point number:***	***Stance on the submission point:**	***Decision sought:**	**Decision sought:**	**Reasons:**
Dave McKevitt	S190.001 & S190.005	Support	Allow submission	Adopt submission	See Orogen submission points S239.010 & S239.018
Dave McKevitt	S190.002 & S190.006	Support	Allow submission	Adopt submission to amend rules.	Refer to Orogen submission S239.004, S239.011, S239.012 & S239.019

					A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approached to earthworks provides a better outcome for industry and compliance.
Dave McKevitt	S190.004 & S190.008	Support	Allow submission	Adopt submission to enable NTU measurements and undertake risk-based approach to winter works.	See Orogen submission S239.010, S239.011, S239.018 & S230.019
***Submitter name or, Submitter number of the submission you are commenting on:**	***Submission point number:**	***Stance on the submission point:**	***Decision sought:**	**Decision sought:**	**Reasons:**
Goodman Contractors Ltd	S274.002	Support	Allow submission	Agree	NTU measurement is more appropriate as per Orogen S239.010
Goodman Contractors Ltd	S274.003	Support	Allow submission	Delete policy and amend associated rule.	Refer to Orogen submission S239.012 & S239.019 A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approached to earthworks provides a better outcome for industry and compliance.
Goodman Contractors Ltd	S274.004	Support	Allow submission	Agree	A risk based approached to water use can be allowed in a Construction Management Plan for a Resource Consent.

*Submitter name or, Submitter number of the submission you are commenting on:	*Submission point number:	*Stance on the submission point:	*Decision sought:	Decision sought:	Reasons:
Fulton Hogan Ltd	S43.013, S43.018, S43.025 & S43.030	Support	Allow submission	Delete policies and amend associated rules.	Refer to Orogen submission S239.012 & S239.019 A blanket policy for winter shutdown is inappropriate and identified by many submitters. A risk based approached to earthworks provides a better outcome for industry and compliance.
*Submitter name or, Submitter number of the submission you are commenting on:	*Submission point number:	*Stance on the submission point:	*Decision sought:	Decision sought:	Reasons:
Peka Peka Farm Limited	S251.007, S251.009, S251.012 & S251.014	Support	Allow submission	Adopt submission to enable unplanned greenfield development.	Refer to Orogen submission point S239.008 & S239.016 Greenfield developments can be appropriately designed to manage all effects and therefore should be considered on their merits. A planning pathway needs to be enabled through PC1 for such developments.