

Please enter your details below:

1. Details of further submitter:

* Submitter Name: Full name, or Name of Organisation / Company	Stormwater360
Contact person for submission: (If different to above)	Julia Watson
Telephone no: (Not required)	Optional
* Address for service: (Email, or physical address) Please note, an email address is the preferred method	juliaw@stormwater360.co.nz
* I wish to be heard in support of my submission at a hearing	Yes
* I would consider presenting a joint case at the hearing with others who make a similar submission	Yes


2. Criteria applicable to Further Submitter:

* Only certain people may make further submissions Please	
A) I am a person representing a relevant aspect of the public interest; or	No
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:	Stormwater360 has 29 years of experience in stormwater treatment and regulation across the globe. We were a part of the Urban Water Working Group providing recommendations to Central Government as well as many local policy and regulation guidelines in other countries. We believe this experience is valuable to New Zealand.

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:
[NRP PC1 Address for Service](#)
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 providing a submission on behalf of a company / organisation I confirm that I have authority to do so:	
Date:	5/04/2024
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 below: 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 ~~striketrough~~ format

Please enter your Further Submission in the next worksheet. All of the original submitters and their associated submission points on 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 email one of our friendly team at regionalplan@gw.govt.nz

Natural Resources Plan: Chapter	Natural Resources Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
Filter original submission point by the chapter location	Filter original submission point by specific provision title	Filter by the original submitter Name and associated Submitter Number	Unique identifying number allocated to each specific submission point	Support Oppose Support in part Oppose in part Not stated	Allow Disallow Allow in part Disallow in part	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.	Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.
General comments	General comments - stormwater management	S151 - Wellington Water Ltd	S151.001	Support	Allow	S151.184: Provide flexibility and a feasible method for determining target load reductions. Justification for Schedule 28 Target Load Reduction and calculations should also be provided.	Support based on our comments already submitted upon Schedule 28 and a lack of technical evidence for the 90% Target Load reduction for copper and zinc in stormwater
General comments	General comments - stormwater management	S151 - Wellington Water Ltd	S151.001	Support	Allow	S151.185: Support comments. Stormwater (and wastewater) discharges should remain a restricted discretionary activity and PC1 should act as a 'one stop shop'	Support amend rules to ensure restricted discretionary remains.
General comments	General comments - stormwater management	S151 - Wellington Water Ltd	S151.001	Support	Allow	S151.186: Support that GWRC should model the state of the environment and that contaminant loading is the important factor in aiming to meet concentration levels. Support the use of Medusa and Contaminant Load Models.	Support contaminant loading and that modelling of concentration is removed based on feasibility.
General comments	General comments - stormwater management	S151 - Wellington Water Ltd	S151.001	Support	Allow	S151.188: Support more clarity on the approach to managing groundwater and that other than for WWTP discharges should be managed by capping and minimising loads so that loads do not increase over time.	Minimising loads through any practicable means is important and rules should be clear to avoid any groundwater contamination. Once groundwater is affected we can't do anything about it.
General comments	General comments - stormwater management	S177 - Transpower New Zealand Limited	S177.013	Oppose	Disallow	Do not support removal of the term 'minor'. Suggest definition of 'minor' is provided in terms of surface area or similar to address the clarity sought. Resurfacing and redevelopment of existing impervious surfaces for the purpose of operating, upgrading and maintaining the National Grid should not be excluded from the rule.	SW discharges from the National Grid have adverse effects on the environment in terms of contaminants in runoff (references will be provided), therefore resurfacing and redevelopment of existing impervious surfaces for the purpose of operating, upgrading and maintaining the National Grid should not be excluded from the rule. Maintenance and repair of surfaces is the best time to retrofit upgrades to stormwater infrastructure, hence should be included outside of those areas defined as 'minor'. Moreover, maintenance or repair of surfaces can affect surface flow rates and therefore should be considered.

Chapter 8	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	S177 - Transpower New Zealand Limited	S177.021	Oppose	Disallow	Suggest the term contaminants is kept - not replaced and that a hydrocarbon effluent concentration is required. Amend policy as follows: Policy WH.P11: Discharges of contaminants hazardous substances in stormwater from high risk industrial or trade premises The discharge of stormwater to water, including discharges via the stormwater network, from a high risk industrial or trade premise shall be managed by: (a) having procedures and equipment in place to contain any spillage of hazardous substances for storage or removal, and (b) avoiding contaminants or hazardous substances being entrained in stormwater and discharged to a surface water body or coastal water, including via the stormwater network, or where avoidance is not practicable, implementing good management practice to avoid or minimise adverse effects on the environment, including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and (c) installing an interceptor that reduces effluent concentration to less than 5mg/L of hydrocarbons where there is a risk of petroleum hydrocarbons entering into the stormwater network, a surface water body or coastal water, and (d) avoiding or mitigating adverse effects of stormwater discharges on groundwater quality	Contaminants should be used to include zinc, copper, phosphorus etc - not just specific to hazardous substances. Less than 5mg/l is the EU standard for hydrocarbon effluent, therefore suggest a standard written in to NZ legislation.
Chapter 8	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity.	S177 - Transpower New Zealand Limited	S177.031	Oppose	Disallow	Oppose removing existing from PC1 on that basis that existing sites need to be included to gain improvements on the current state and reach TAS outlined in PC1.	References will be provided in evidence for the hearing. Contaminants should remain considered and as separate from hazardous substances.
Chapter 8	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	S177 - Transpower New Zealand Limited	S177.032	Oppose	Disallow	Suggest High risk industrial and trade premises should remain excluded on the basis of potentially high contaminant loading. Disagree with effluent level proposed and suggests hydrocarbon effluent concentration should be less than 5mg/L , and should be included under Policy WH.P11	For high risk industrial sites URQIS data shows 25% of samples from untreated sites were over 100mg/l, hence the sites should be treated and no development on such sites should be a permitted activity. Less than 5mg/l is the EU standard for hydrocarbon effluent. References will be provided in evidence for the hearing
Chapter 8	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas – controlled activity.	S177 - Transpower New Zealand Limited	S177.034	Oppose in part	Disallow in part	Suggest High risk industrial and trade premises should remain excluded on the basis of potentially high contaminant loading. Disagree with effluent level proposed and suggests hydrocarbon effluent concentration should be less than 5mg/L , and should be included under Policy WH.P11	For high risk industrial sites URQIS data shows 25% of samples from untreated sites were over 100mg/l, hence the sites should be treated and no development on such sites should be a permitted activity. Less than 5mg/l is the EU standard for hydrocarbon effluent. References will be provided in evidence for the hearing
Chapter 8	Rule WH.R12: All other stormwater discharges – non-complying activity.	S177 - Transpower New Zealand Limited	S177.035	Oppose	Disallow	Suggest financial contributions remain on the basis of funding required for stormwater infrastructure upgrades.	Stormwater is underfunded over the years and needs an income source to gain any improvements and reach TAS.
Chapter 9	Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises.	S177 - Transpower New Zealand Limited	S177.047	Oppose	Disallow	Suggest policy stays on the basis that entrainment of contaminants should too be avoided.	The policy notes where avoidance is not practicable that good management practice should be used, which is achievable.

Chapter 9	Rule P.R6: Stormwater from new greenfield impervious surfaces – controlled activity.	S177 - Transpower New Zealand Limited	S177.059	Oppose	Disallow	Suggest High risk industrial and trade premises should remain excluded on the basis of potentially high contaminant loading. Disagree with effluent level proposed and suggests hydrocarbon effluent concentration should be less than 5mg/L , and should be included under Policy WH.P11	For high risk industrial sites URQIS data shows 25% of samples from untreated sites were over 100mg/l, hence the sites should be treated and no development on such sites should be a permitted activity. Less than 5mg/l is the EU standard for hydrocarbon effluent. References will be provided in evidence for the hearing
Chapter 9	Rule P.R10: Stormwater from new and redeveloped impervious surfaces–discretionary activity.	S177 - Transpower New Zealand Limited	S177.061	Oppose	Disallow	Suggest financial contributions remain on the basis of funding required for stormwater infrastructure upgrades.	Stormwater is underfunded over the years and needs an income source to gain any improvements and reach freshwater TAS.
Chapter 12	Schedule 28: Stormwater Contaminant Treatment.	S177 - Transpower New Zealand Limited	S177.070	Support	Allow	Further suggest phosphorus and nitrogen should be included in Schedule 28 on the basis they are measured in TAS	
Chapter 12	Schedule 29: Stormwater Impact Assessments.	S177 - Transpower New Zealand Limited	S177.071	Oppose in part	Disallow in part	Oppose on the basis that alternative materials to existing can alter flow rates and volumes. Contaminants should also remain.	