

15 December 2023

Environmental Policy
Greater Wellington
Via email: regionalplan@gw.govt.nz

Dear Fathima,

Natural Resource Plan – Plan Change 1 Submission

Thank you for the opportunity to submit on Plan Change 1 (PC1) of the Natural Resources Plan (NRP). As discussed with your officers, we are submitting on a range of provisions.

Our submission is in three parts, being:

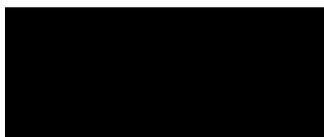
- Section A - overarching submission points
- Section B – commentary in the Greater Wellington template spreadsheet on specific provisions
- Section C - provisions of relevance to network discharges and prioritisation.

Wellington Water sees benefit in further discussions on a number of matters as part of the plan change process. In particular, we consider that discussions on target attribute states would be helpful. We are willing to attend meetings organised by Greater Wellington to continue these discussions and would be happy to help set these up. We appreciate the positive relationship between our environmental policy teams and hope that we can work together on PC1 to implement Te Mana o te Wai across the three waters services.

We wish to be heard at the hearing and we will not have a trade advantage as a result of this submission.

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Yours sincerely



Julie Alexander
Group Manager Network Strategy and Planning

SECTION A: OVERARCHING SUBMISSION POINTS

1 Beneficial infrastructure - objectives and policies

1. Objective 1 of the National Policy Statement for Urban Development (NPS-UD) is for New Zealand to have well-functioning urban environments. This concept is picked up and applied in the provisions of the RPS, as presently proposed in RPS Change 1. In particular, those provisions identify that constraints on infrastructure in turn constrain well-functioning urban areas, and addressing this is one of six regionally significant issues for regional form, design and function. This translates into proposed Objective 22 in the RPS which requires:
 - existing infrastructure capacity to be used effectively and efficiently;
 - new or upgraded infrastructure to be integrated and sequenced with development; and
 - protection of the safe and efficient operation of regionally significant infrastructure from potential reverse sensitivity effects.
2. This in turn is supported by proposed RPS policies, that emphasise the importance of infrastructure to support urban environments, such as Policy 58.
3. Wellington Water considers more specific objective and policy support is required in PC1 to ensure that the NRP gives effect to these aspects of national and regional policy direction, and for consistency with Objective O10 of the NRP, specifically in relation to wastewater infrastructure. Proposed PC1 policies should recognise that robust, cost-effective, and efficient wastewater and stormwater networks are essential to human health, human safety and social and cultural well-being.
4. This could be achieved by providing the relief sought below:
 - Altering existing O9 as follows (additional wording in **bold**, deletions in ~~striketrough~~):

The social, economic, cultural and environmental benefits of Regionally Significant Infrastructure, renewable energy generation activities and the utilisation of mineral resources are recognized **and provided for**.
 - And by reinstating and altering existing O6 as follows:

The social, economic, cultural and environmental benefits of:

 - taking and using water ~~are recognized~~
 - **managing stormwater for the safety of people and property**
 - **disposing of wastewater to achieve public health outcomes**

are recognized and provided for when managing water.

2 Enabling policies and rules for stormwater and wastewater

5. It is important that the specific policies and rules relating to stormwater and wastewater help deliver on the Greater Wellington’s water quality objectives, while also enabling the efficient and effective management of the stormwater and wastewater networks.
6. Wellington Water is concerned that as currently drafted, the PC1 policies and rules are not sufficiently enabling, and in some instances are not feasible to implement. Accordingly, Wellington Water seeks changes to policies and rules to:
 - 6.1 Cleanly provide for stormwater and wastewater discharges from local authority networks as a restricted discretionary activity, without this status being jeopardised by subjective assessments of the merits of the SMS or WNCIS, or non-complying activity rules in other parts of the NRP.
 - 6.2 Provide guidance on the matters to be considered in prioritising sub-catchments for improvement works, while also ensuring sufficient flexibility to take account of practical matters such as investment availability and efficiencies and alignment with other workstreams (including wastewater improvement works).
 - 6.3 Allow matters of detail to be specified in sub-catchment SMPs and SIPs, rather than in the initial SMS and WNCIS.
 - 6.4 Provide flexibility for determining the load reductions required in order to appropriately contribute to meeting the TAS (in light of our present concerns with the TAS, lack of information as to baseline states in many cases, and the uncertainty around the ‘commensurate reduction’ wording and whether this is realistic (i.e. properly within Wellington Water’s control) for all attributes). While it is necessary for Wellington Water to reserve its position (and secure scope) at the submission stage, we envisage that this will be a matter for further discussion with Greater Wellington in advance of the PC1 hearing.
 - 6.5 Provide for dry weather discharges (such as dry weather overflows and exfiltration) to be managed via a ‘responsive management approach’ rather than with reference to the TAS (due to the current inability to forecast dry weather overflows or assess the correlation between dry weather discharges within the control of Wellington Water and TAS being achieved).
7. Without limiting the generality of the above, Wellington Water has set out specific relief in relation to the stormwater and wastewater policies and rules in Section B.

3 Clear activity status

8. Wellington Water is supportive of Greater Wellington’s intention to make stormwater and wastewater discharges from the local authority networks a Restricted Discretionary activity. We also support public notification being precluded for these applications.
9. However, Wellington Water is concerned that despite this intention, the Restricted Discretionary status may be uncertain or undermined by:
 - 9.1 The current drafting of the relevant rules, which include a pre-requisite or ‘condition’ that the activity must be accompanied by a strategy prepared “in accordance with” (as relevant) Schedules 31 or 32. This framing and the subjective wording of some of the requirements in the Schedules themselves could invite debate as to whether the relevant strategy is ‘in

accordance' with them, and thus whether Restricted Discretionary status applies. (An example would be if there were differing views as to whether the strategy could achieve the ambitious Target Attribute State (**TAS**) values and timeframes.) We consider this approach is too uncertain for the activity status, and also duplicates the substantive assessment of the applications. There is ample scope for decision-makers to consider the merits of applications against the objectives and policies and matters of discretion, without also having to assess those matters in detail when determining activity status.

- 9.2 Additionally, there are further rules in the NRP that Wellington Water consider should not apply to discharges from the local authority networks. Under PC1 as notified, operative rules such as those relating to sites of significance and wetlands, and the National Environmental Standard for Freshwater, would continue to apply to any stormwater or wastewater discharge from the network. For example, rule R120 (Non-Complying) continues to apply in relation to discharges to outstanding natural wetlands, as does rule R93 (Non-Complying – for stormwater discharges to Schedule F3 wetlands that do not comply with rule R117). Wellington Water consider these other less specific rules would undermine the restricted discretionary activity status proposed in PC1 for network discharges and cannot have been intended. This is reinforced by the effects on sites of significance being included within the matters of discretion under the new restricted discretionary rules.

10. Wellington Water therefore seeks:

- 10.1 Amendments to the rules for stormwater and wastewater discharges from the local authority networks (and/or the associated Schedules), so that they refer to objective information requirements rather than inviting a detailed assessment against the schedules to determine activity status; and
- 10.2 All amendments necessary (including disapplying rules in other parts of the NRP) to ensure that the wastewater and stormwater from local authority networks remain a restricted discretionary activity, and the associated rules in PC1 function as a 'one stop shop' in the relevant whitua.

4 Practicable Target Attribute States and Coastal Water Objectives

11. Wellington Water does not support the provisions relating to TAS and Coastal Water Objectives (**CWO**) as they are currently drafted. There is a general lack of information relating to the baseline state to measure against, meaning it is not possible to determine whether the TAS parameters and requirements are reasonable, appropriate and achievable. The CWO contained in Table 8.1 are considered generally appropriate parameters for coastal environmental health, however the lack of information relating to baseline states and timeframes to meet the requirements makes it difficult to determine whether improvement is measurable. It is also not clear how the TAS and CWO provisions would be assessed and measured through the resource consent process.
12. The provisions do not currently recognise the complexities and contributing factors for achieving these TAS. As discussed below in relation to 'Commensurate Reductions', the contribution to meeting TAS for network discharges cannot wholly sit with Wellington Water as there are many

factors within catchments that contribute to water quality. Another example is the magnitude of work involved in delivering water quality improvements. The provisions as drafted are not considered to adequately reflect these constraints. It is therefore requested that the plan change include guidance or provisions that outline how proportional contribution to meeting the TAS can be demonstrated, and more realistic timeframes in the relevant TAS tables.

13. The uncertainty and lack of information in the provisions regarding the baseline state means that, at this stage, Wellington Water cannot undertake a full assessment of the potential impact that the TAS/CWO provisions will have on our discharge consent applications and the prioritisation and implementation of sub-catchment improvements. Based on our high-level assessment, we consider it is likely that the TAS 2040 timeframe (particularly as it relates to *E. coli*), will result in the requirement for a large proportion of sub-catchments (or possibly all of them) to be upgraded in the short term. As such, undertaking a prioritisation exercise and implementing the sub-catchment management plans for stormwater and wastewater could be rendered meaningless. This is unlikely to allow for progressive improvement, or for practicable implementation.
14. On this basis, Wellington Water opposes the provisions relating to TAS and CWO in full. We would welcome further discussions with Greater Wellington on this matter, particularly around a more detailed assessment of the implications of the TAS and CWO provisions on a sub-catchment basis and a clear understanding of how these would be addressed in a resource consent application. Further detailed comments are provided in Section B of our submission.

5 Deliverable programmes of work

15. The scale and volume of work necessary between now and 2040 to achieve the necessary reduction in wet weather wastewater overflows, dry weather wastewater discharges and stormwater contamination is significant. For over 100 years, the wastewater and stormwater networks have focused on public health (wastewater) and public safety (flooding). Retrofitting the urban areas of four cities to also address environmental outcomes will take decades of planning, designing and construction. This work needs to be done, however Wellington Water considers that 17 years (between now and 2040) is insufficient to achieve this, and notes the following points for particular consideration.
 - 15.1 There are approximately 26 sub-catchments for Wellington Water to deliver infrastructure upgrades in. We have planned to spend several years in each sub catchment from when we start the planning to when we complete construction. The timeframes will get shorter over time, and in time we will have capacity to manage more sub-catchments eg regularly start two per year. Note that Lambton Harbour is particularly complex, so we have allowed 15 years for these improvements.
 - 15.2 Delivery of the network discharges programme at such a fast pace will impact on delivery of other important work programmes for Te Mana o te Wai such as storage lakes for drinking water supply to support increased minimum flows, wastewater treatment plant upgrades and the renewals programmes for both wastewater and water supply.
16. Wellington Water submits that all timeframes associated with TAS should be altered from 2040 to 2060.

17. Regardless of the timeframe, the winter shutdown for earthworks will make delivery of any large-scale programme of work impracticable and so we have requested an exemption for Regionally Significant Infrastructure.

6 Meaningful prioritisation of sub-catchments

18. Wellington Water is generally supportive of the requirement to provide methodologies to prioritise sub-catchment upgrades or improvements as part of consent applications for stormwater network discharges and wastewater network discharges. It is appropriate that prioritisation methodologies, rather than the actual order of sub-catchments, are provided as part of the Wastewater Network Catchment Improvement Strategy (**WNCIS**) and Stormwater Management Strategy (**SMS**). This is discussed further below.
19. The ability to effectively plan for and implement improvements involves a complex range of factors which need to be considered when prioritising the sub-catchments. Wellington Water's view is that the prioritisation should be done in an integrated manner considering both stormwater and wastewater discharges concurrently. This would be done with investors and mana whenua in a collaborative manner. In addition, the range of factors that should influence prioritisation are greater in breadth than that currently indicated within the plan change provisions.
20. There are a number of existing and proposed provisions that specifically require prioritisation of certain matters, including scheduled sites, TAS, CWO, and mahinga kai. There are also provisions that have varying levels of requirement to 'protect', 'meaningfully improve', 'progressively improve', 'avoid', 'restore', 'maintain', 'improve', some within distinct (and different) timeframes and others within 'reasonable timeframes'.
21. By way of example, the following figures illustrate some of the matters identified within the plan change provisions that require prioritisation in respect of wastewater and stormwater network discharges on a sub-catchment basis. The darker shades represent the number of schedules/matters applying to that sub-catchment.

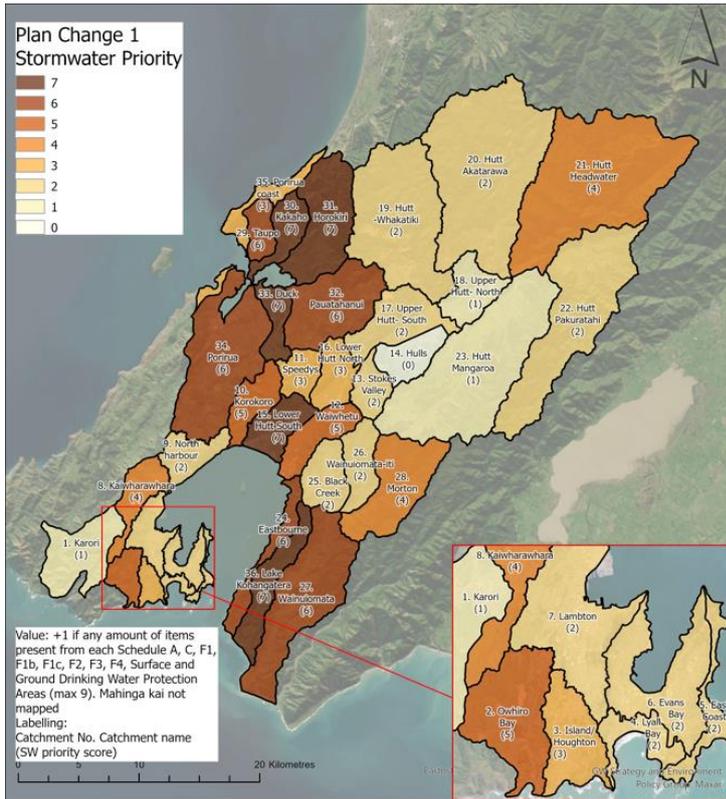


Figure 1: Stormwater priority matters – Schedule A, Schedule C, Schedule F, group drinking water supply and community drinking water supply.

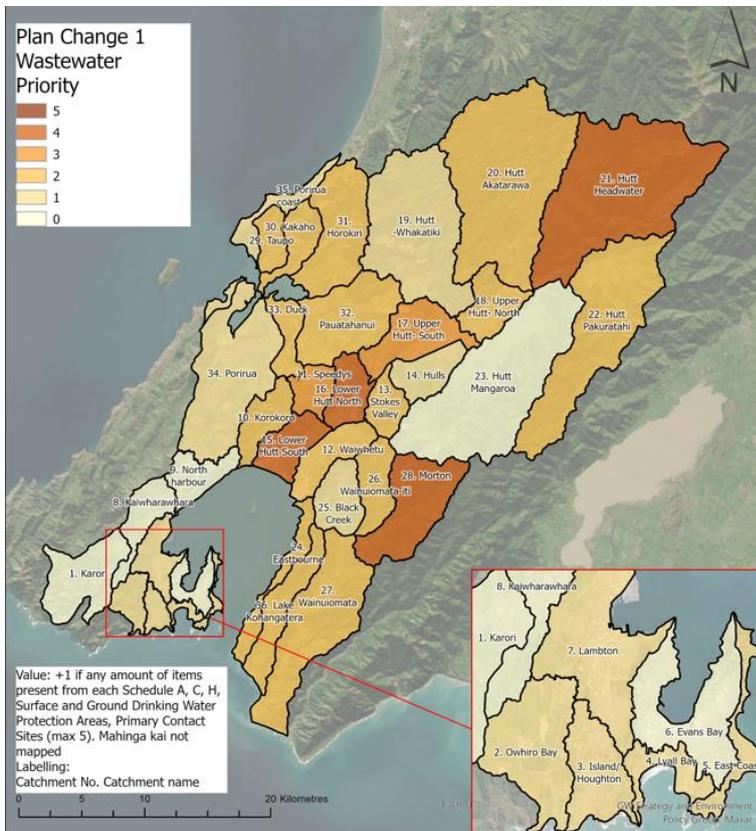


Figure 2 – wastewater priority matters – Schedule A, Schedule C, Schedule H, primary contact sites (Map 85), group drinking water supply and community drinking water supply.

22. It is noted that the above figures do not include consideration of environmental effects, target attribute state/coastal water objective requirements, baseline or state of environment information, or existing operative provisions outside of those included in PC1 that may also influence prioritisation. The figures do, however, illustrate the impact that the provisions as currently drafted may have in terms of requiring prioritisation, without taking account of the broader matters that Wellington Water considers are necessary to ensure deliverability and implementation of sub-catchment upgrades and improvements. It is also noted that the large number of sub-catchments that theoretically require prioritisation in PC1 for stormwater and wastewater do not necessarily align, and it is Wellington Water's preference that prioritisation would be undertaken in a more integrated manner so that sub-catchments are upgraded at one time for both wastewater and stormwater discharges.
23. Overall, the number of provisions that could influence the prioritisation of sub-catchments for improvements is overly complicated and does not provide enough clear direction (see Section C – provisions of relevance to network discharges and prioritisation). Wellington Water consider that prioritisation requirements should be made clearer in the plan change.
24. In summary, we submit that the matters to be considered when setting the prioritisation, or sequence, of sub-catchments should be listed (or cross-referred to) within:
- Policy WH.P13 (stormwater)
 - Policy WH.P19 (wastewater)
 - Policy P.P12 (stormwater)
 - Policy P.P18 (wastewater)
25. We have provided recommended wording to this effect in Section B. It is critical for Wellington Water that matters such as efficiency of delivery are considered during the process of prioritisation, to allow alignment with other work programmes and to ensure an integrated approach. Investment availability and allocation is also an essential consideration for any prioritisation exercise to manage investment profiles and ensure deliverability across the term of consent. This is discussed further in relation to 'deliverability'.
26. We request that provisions within the plan change that specifically use the terminology 'prioritise' or 'prioritisation', or otherwise speak to the relative urgency of improving or enhancing certain values (other than those mentioned above), are redrafted to make it clear that they do not apply to applications for stormwater and wastewater network discharges.
27. We also request that Greater Wellington consider the wording of provisions as they relate to varying levels of requirements such as 'avoid' or 'protect' in terms of the level of importance represented by the provisions, and how this could be considered to influence decision making on a prioritisation methodology. Ideally, these provisions would not apply to stormwater and wastewater network discharges either.
28. As noted above in the previous section, the TAS requirements in PC1 as notified would likely render the process of prioritising sub-catchments for improvement or upgrade meaningless due to the requirements to meet 2040 targets. The use of terminology such as 'reasonable timeframes' within other provisions of PC1 creates additional uncertainty in relation to the prioritisation exercise.

7 Commensurate reductions to contaminants

29. A number of PC1 provisions for stormwater and wastewater discharges refer to making reductions of either copper and zinc (for stormwater, e.g. rules WH.R9, P.R8, and Schedule 31), or *E. coli* or enterococci (for wastewater, e.g. rules WH.R14 and P.R13, and Schedule 32), that are “commensurate with what is required in the receiving environment to meet the target attribute state” (or similar wording).
30. In principle, Wellington Water acknowledges the need for improvements or reductions that are commensurate with or proportionate to the effects of the relevant discharge on the attribute state of the receiving environment.
31. However, as worded, Wellington Water is concerned that these requirements are ambiguous, because it is not clear whether they mean:
 - a reduction in contaminant load that reflects the effect of the discharge on the receiving environment (which would require modelling/technical assessment), or
 - simply a percentage reduction in all cases that reflects the percentage difference between the TAS and the baseline state of the receiving environment.
32. The second interpretation may be unduly onerous where it does not reflect the actual contribution of the relevant discharge, while the first interpretation would require Wellington Water to acquire information or assessment tools that are not currently available.
33. Put simply, Wellington Water does not currently have access to the data or analytical tools required to assess the correlation between contaminant load out of a pipe and contaminant concentrations (i.e. TAS) in the receiving environment. This relates to the point in paragraph 11 of this submission that ‘It is also not clear how the TAS and CWO provisions would be assessed and measured through the resource consent process.’
34. While Wellington Water is able to model the contaminant load (e.g. total kilograms of copper and zinc from the stormwater network), how that translates to concentrations in the receiving environment is dependent on factors such as stream flows and ocean currents (which affect dilution and therefore concentration).
35. If PC1 is reliant on this assessment, then a new method needs to be included in PC1 for Greater Wellington to provide the necessary analytical tools to determine the correlation.
36. Notably, PC1 does provide *load reduction* targets to ‘contribute to meeting’ the relevant TAS and CWOs¹ in some locations. In terms of certainty (and subject to the targets being realistic), Wellington Water supports PC1 including clear targets for load reductions in the discharge, rather than unclear formulas such as “commensurate”.
37. The section 32 Report (Part D – paras 59-63) indicates that these requirements were derived by assessing both the contribution of the stormwater discharge to the receiving environment, but also what is realistically achievable through stormwater network discharge mitigations (i.e. meaningfully within Wellington Water’s control). For example, the lower 15% target for copper reflects the fact that “much of the reduction sought for copper is outside the control of

¹ Stormwater Policy P.P12 (a) provides *load reduction* targets (of 15% for copper and 40% for zinc), for the coastal water management units of Onepoto Arm and Pāuatahanui Inlet and specified harbour arm catchments.

Wellington Water” (i.e. also requiring measures such as replacing copper brake pad linings, and non-regulatory methods through Freshwater Action Plans). We consider that this acknowledged reality is not reflected by the proposed references (in other parts of PC1) to reductions “commensurate to achieving” the TAS, which would suggest that Wellington Water needs to reduce copper by much more than 15%, for the TAS to be achieved.

38. Moreover, Wellington Water would like to understand what actions were considered to be realistically achievable through stormwater network discharge mitigations, which is not clear from Greer 2023, but is obviously a critical determinant for setting of the TAS. We may review our submission points further once we have a greater understanding in this space.
39. Accordingly, in determining targets for load reductions, it is necessary to consider both the extent to which the discharge load contributes to achieving (or not achieving) the TAS, and also the extent to which this is realistically within Wellington Water’s control. That analysis has not yet been undertaken for stormwater catchments beyond Porirua, or for *E. coli* or enterococci in relation to wastewater. Unless or until that work has been carried out, and Wellington Water considers the outcomes reasonable, Wellington Water does not support the “commensurate reductions” wording in PC1.
40. In addition, Wellington Water considers it is not realistic to require confirmation of load reduction targets as part of the application documentation. At most, this is something that could be determined at the sub-catchment planning stage, with the high level strategies required under Schedules 31 and 32 instead specifying the intended methodology or approach for determining this.
41. These assessments will require state of the environment information and/or modelling that is not available to Wellington Water. Accordingly, Wellington Water’s expectation is that Greater Wellington will be producing the modelling necessary for Wellington Water to determine the appropriate (or ‘commensurate’) load reduction targets.
42. Finally, there are additional complexities in ascertaining the contribution of dry weather overflows and exfiltration to achieving the TAS. Dry weather discharges from stormwater pipes can be from a private cross connection, and therefore are not a matter within Wellington Water’s control. Moreover, Wellington Water does not model cross connections because they are an aberration. Wellington Water therefore seeks that rather than a requirement to reduce dry weather overflows and exfiltration to contribute to meeting the TAS, that they be subject to a separate ‘responsive management’ programme.
43. Accordingly, Wellington Water seeks that:
 - All requirements to determine ‘commensurate’ reductions at the application stage are removed, and that different wording is used to acknowledge that in some cases ‘at source’ reductions are not within the applicant’s control (for example, the reduction of copper in stormwater, as acknowledged in the section 32 report and discussed above) Specific changes to provisions to address this issue are included in Section B of this submission;
 - The requirements to make reductions in order to contribute to meeting the TAS in relation to wastewater are confined to wet weather overflows (and then only the 95th percentile), with dry weather overflows and exfiltration subject to a separate responsive management regime;

- PC1 is amended to either include load reduction targets for Te Whanganui-a-Tara and for other parameters, or to provide clear directions as to how Wellington Water (and other applicants) can demonstrate their contribution to achieving TAS;
- The methods and/or Schedule 27 (Freshwater Action Plan requirements) are amended to confirm that the modelling and monitoring to facilitate the identification of load reduction targets in SMPs and SIPs will be undertaken by Greater Wellington; and/or
- In the alternative, should the “commensurate” wording be retained in PC1, that this term is defined and/or guidance provided in the policies to ensure it reflects reductions that are both proportionate to the effects of the discharges on the TAS in question, as well as the extent to which reductions are reasonably within the control of the applicant. A definition is proposed in Section B of this submission.

8 Modelling requirements

44. Wellington Water supports the recognition of the role of modelling in PC1 as an analytical tool, including to assess the performance of the wastewater and stormwater networks and compliance with associated consent requirements.
45. However, PC1 as notified will require Wellington Water to undertake significantly more modelling than it already does. In some cases this will be onerous with no additional benefit in predicting load reductions or *E. coli* reductions. For example, Schedule 32 appears to require the full wastewater network to be modelled as part of preparing the WNCIS. However, this work will not improve our understanding of overflows beyond that provided by our current ‘Strategic Model’.
46. PC1 requires that reviews of the SMS are also guided by modelling and monitoring undertaken by the global stormwater discharge consent holder(s). Wellington Water is concerned that this will place an unreasonably high burden on consent holders. Instead, we consider that any receiving environment modelling should be undertaken by Greater Wellington, including state of the environment modelling which is required to ascertain the baseline state for identified attributes.
47. Further, PC1 repeatedly refers to modelling of load as well as concentration of contaminants. For example, Policies WH.P19 and P.P18 require modelling the wastewater network catchments to:
 - identify catchments to be prioritised,
 - the *E. coli* or enterococci concentration in the discharge, and
 - changes in discharge frequency, volume and quality over time following improvements in the network infrastructure.
48. However, concentration cannot be easily or accurately modelled, and would not provide valuable insight. The focus should therefore be on modelling and managing contaminant load, not concentrations.
49. In addition, as noted above, Wellington Water can undertake modelling for contaminant loads and is looking into models such as the ‘Contaminant Load Model’ (CLM) and ‘Medusa’ for that purpose. However, ascertaining the load reductions necessary to achieve (or contribute to achieving) the TAS will also require the use of receiving environment models such as the ‘Fresh Water Management Tool’ (FWMT), which is a project that should be undertaken by Greater Wellington.

50. Wellington Water is also not able to model *E. coli* or enterococci concentrations or load, and instead must use the wet weather discharge frequency as a proxy for this.

51. As such, Wellington Water seeks that:

- PC1 be amended to remove unnecessary modelling requirements which are currently to be undertaken by the consent holder;
- Greater Wellington be responsible for all state of the environment modelling; and
- Reference to modelling 'concentrations' are removed.

9 Monitoring of stormwater and wastewater discharge effects

52. Wellington Water supports the proposed partnership between Greater Wellington and consent holders regarding the monitoring for stormwater and wastewater discharge effects. However, more definition is required around what each party is responsible for.

53. For background, Wellington Water is currently implementing a monitoring plan under its Stage 1 Global Stormwater consent. The broad purpose is to develop a baseline of information on the effects of the stormwater discharges from the local authority stormwater network on receiving environments. Once the baseline is established, it is anticipated that the monitoring plan will be revised to provide a single integrated receiving environment monitoring approach for Wellington Water's network discharges (stormwater and wastewater). Under the monitoring plan, it is expected that any broader state of the environment monitoring will be undertaken by Greater Wellington (this information will be used in a cooperative way, just as the current Stage 1 monitoring relies on information collected not just by Greater Wellington but also by NIWA). Wellington Water considers that this is the most appropriate approach to monitoring, and submits that this should be reflected in the PC1.

54. Wellington Water is concerned that the PC1 provisions may envisage or require more monitoring to inform the wastewater and stormwater modelling than is actually necessary (or may be necessary in future). As such, a number of minor changes are sought such as to have the Strategies (as per the Schedule 31 and 32 requirements) describe the monitoring to be undertaken "(if any)", rather than presume there will be monitoring of the network in all cases.

55. Overall, Wellington Water seeks that PC1:

- Clearly indicates what monitoring consent holders are responsible for; and
- Clarifies that Greater Wellington is responsible for all state of the environment monitoring.

10 Schedule 31

56. Wellington Water generally supports Schedule 31, including:

- 56.1 The provision for 'Stormwater Management Plans' to be developed and implemented over time under Schedule 31 (Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua). These are equivalent to the 'sub-catchment management plans' or

‘SCaMPs’ proposed in Wellington Water’s stormwater application, which is currently being processed by Greater Wellington, and

- 56.2 The requirement to provide a methodology for prioritisation in the SMS, rather than the actual prioritisation having to be specified in the Strategy at the time consent is sought. Amendments are proposed in terms of what that methodology should consider, as discussed in the Prioritisation submission point above, and detailed in Section B.
57. However, Wellington Water seeks several amendments to improve workability and provide guidance, including as set out below:
- 57.1 The requirement in Clause 1 to manage stormwater ‘in accordance with’ the objectives and policies of the Plan invites second guessing and the exercise of subjective judgement from decision-makers (or submitters), which is not appropriate in a Schedule and (as discussed in section 3 above) could affect an application’s activity status. Wellington Water seeks that this clause is reframed as an information requirement to describe how the strategy responds to the relevant objectives and policies in the Plan.
- 57.2 While Wellington Water is not opposed to the reference to groundwater in clause 2, there is a need to clarify the references and requirements in relation to groundwater throughout PC1 (see Groundwater section below). In addition, this point needs to be carefully managed to ensure that it is not too onerous.
- 57.3 Wellington Water opposes the reference to contaminant concentrations in clause 4 (and elsewhere throughout PC1). Concentrations are influenced by receiving water flows, currents, deposition and upstream catchments. The “concentration” in the discharge effectively is meaningless as it is immediately diluted as it enters the receiving water. Identifying contaminant load in the discharge is more appropriate as it can be measured, modelled, and then reduced.
- 57.4 The requirement to identify ‘commensurate reductions’ in clause 5 for a number of reasons, as discussed above. Wellington Water seeks alternative wording, as well as acknowledgement that the details of reduction targets may not be unknown until the SCaMP stage.
- 57.5 The SMS should only provide high level information as it is to be submitted with the resource consent application. A number of the information requirements in Schedule 31 are too onerous and/or require too much detail for a strategy. Wellington Water considers that it would be more appropriate to include specific information (for example, identifying locations for the retention or detention of stormwater flows or volumes) in the SCaMPs. A number of changes are sought in this regard. These are outlined in Section B of our submission.

11 Schedule 32

58. Wellington Water generally supports Schedule 32, including:

- the provision for the sub-catchment plans to be developed and implemented over time.
- the requirement to provide a methodology for prioritisation in the WNCIS, rather than the actual prioritisation having to be specified in the Strategy at the time consent is sought.

Amendments are proposed in terms of what that methodology should consider, as discussed in the Prioritisation submission point above and detailed in Section B of our submission.

59. However, Wellington Water seeks several amendments to improve workability and provide guidance in some areas, including as follows:
- 59.1 The rules (WH.R14 and P.R13) require the WNCIS to be lodged with a resource consent application. This does not allow room for details to be added later, once the consent has been granted. Wellington Water considers that the level of detail required in Schedule 32 is difficult to achieve, and requirements for more specific details should be left to the Sub-catchment Improvement Plans. A number of amendments are sought in this regard.
 - 59.2 While Wellington Water is supportive of the intention for individual sub-catchments to be able to set more or less ambitious containment standards; this should be decided after consent has been granted through the sub-catchment improvement plans. Flexibility should be given to the consent holder to decide at a later date the exact methods and programme of works required to meet the overall outcome described in the Schedule. In addition, Wellington Water considers Schedule 32 should reference a 35 year timeframe for achieving the containment standard(s).
 - 59.3 Schedule 32 refers to 'volume' of wastewater discharge. Wellington Water is not supportive of using volume as a metric. Modelling the frequency of wastewater discharges is more appropriate.
 - 59.4 The Schedule should provide for dry weather discharges (such as dry weather overflows and exfiltration) to be managed via a 'responsive management approach' rather than with reference to the TAS. This is because of the current inability to forecast dry weather overflows or assess the correlation between dry weather discharges within the control of Wellington Water and TAS being achieved.
60. Further comments on individual schedule 32 clauses are provided in Section B of our submission.

12 Freshwater action plans

61. Wellington Water is unclear on how the FAPs are intended to operate alongside other provisions within PC1, Wellington Water stormwater and wastewater network discharge consents, and in general Wellington Water's network operations. The current provisions for FAPs, although a non-regulatory 'other method', could be read to have some level of influence in relation to wastewater and stormwater network discharge consents and prioritisation of sub-catchments.
62. For example, under Method M35: Freshwater Action Plan for the Rangituhi Catchment, there is a requirement that the plan will *'identify, in detail, the actions...to achieve target attribute states and environmental outcomes...'* and that the action plan will include *'prioritising improvements in hotspot areas of elevated metal concentrations within the harbour...'*
63. Schedule 27 states that the FAPs will identify and prioritise actions to achieve TAS and local reduction targets, and *'identify timeframes by which target attribute states...will be met'*, along with how the TAS will be achieved and required actions. Schedule 27 also specifies that a FAP may *'outline a spatial or temporal prioritisation of actions...'*
64. Wellington Water requests clarification from Greater Wellington regarding how the FAP provisions will work alongside existing TAS provisions, network discharge consent provisions,

and in particular Schedules 31 and 32. We also request that Greater Wellington clarify what is intended in terms of the level of consideration or influence that any FAP could have on wastewater and stormwater network discharge consents, noting that Wellington Water considers that there should be no relationship between the contents of a FAP and the scheduled requirements for network discharge consents.

13 Hydrological controls

65. Wellington Water supports the requirement for hydrological controls for land uses that create new, or redevelop existing, impervious surfaces. Wellington Water also supports a consistent definition for hydrological controls between the NRP and the Regional Policy Statement (RPS).
66. Wellington Water promotes a cascading approach to addressing hydrological control in the RPS and NPS; with the RPS setting a regional requirement for hydrological controls and the detail of hydrological control standards being set by the NRP.
67. As proposed, the NRP provisions merely re-state the requirement for hydrological controls and are considerably less specific than corresponding provisions proposed for inclusion in the RPS PC1. Wellington Water considers the relevant provisions in the NRP should be amended to contain clear, detailed and specific direction regarding the hydrological control standards to be met. Wellington Water would generally support standards based on a specified depth of rainfall retention (e.g. retention of the first 5mm of rainfall depth).

14 Definitions

68. Wellington Water generally supports the new definitions introduced as part of PC1. In some instances, refinements have been sought as set out in Section B.
69. Two definitions, which Wellington Water supports the intention of, are sufficiently important to warrant special mention:
 - 69.1 *Existing wastewater discharge*: Wellington Water supports this definition, and PC1 taking a broad approach to defining what constitutes an 'existing wastewater discharge', which is a restricted discretionary activity in the relevant rules. It is important that this definition facilitates the integrated management of the wastewater network (and discharges from it), but avoids a fragmented approach where additional 'add on' consents need to be sought. In particular, this definition needs to remain broad enough to include new discharge locations created as part of improvement works (e.g. new discharge points from attenuation tanks), or instances where an uncontrolled overflow point is replaced with a new constructed overflow point.
 - 69.2 *Containment standard*: Wellington Water supports this definition, which is consistent with the approach that has been adopted in its wet weather overflow applications. In particular, it is important that achievement of containment standards is assessed 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.

15 Groundwater

70. Provisions in PC1 to manage contaminants discharged to groundwater are inconsistent and unclear and place too much focus on stormwater. For example:
- Policy WH.P7 discharges to groundwater is a holistic policy, however it is not carried through to all relevant activities.
 - Rule R48 Stormwater from individual property – does not mention any effects on groundwater.
 - Rule WH.R3 Stormwater from individual property – does not mention any effects on groundwater.
 - Rule WH.R4 Stormwater from existing high risk premise – limits the effects on groundwater to potable water or stock water.
 - Rule R51 Stormwater to land permitted – limits the effects on groundwater to potable water or stock water.
 - Rule WH.R2 Stormwater to land – limits the effects on groundwater to potable water or stock water.
 - s5.1.13 general conditions - there is no mention of discharge to groundwater.
 - Policy P73 Farm plans – no mention of minimising contamination of groundwater even though farming is a known major contributor in many areas of Aotearoa New Zealand.
 - Rule R54 Stormwater from ports – does not include discharge to groundwater.
 - Schedule 31 – Local authorities need to address effects on groundwater as part of the SMS. Policy WH.P21 and P22 refer to “capping, minimising and reducing”, not increasing over time and where TAS are exceeded reductions are “to the extent reasonably practicable”. This is very different to the expectations for stormwater and wastewater from local authority networks.
71. To address these inconsistencies, we seek greater clarity of the approach to managing groundwater, including increased focus on recognised and accepted effects from activities, rather than just activities. Alternatively, we seek that discharges of contaminants from the stormwater and wastewater network (other than from a Wastewater Treatment Plant (WWTP)) should be managed by capping, minimising and reducing loads so they do not increase over time and where TAS are exceeded, the reduction is to the extent reasonably practicable.

16 Relief Sought

72. Where possible Wellington Water has specified relief to guide amendments to PC1 that may address the issues raised in this section and in Section B.
73. In addition to the relief Wellington Water has specified, Wellington Water seeks such other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
74. For some provisions of particular importance or complexity, Wellington Water has also provided tracked changes for specific relief it is seeking. The absence of tracked changes for all provisions relevant to the issues raised by Wellington Water’s submissions does not imply that Wellington Water is satisfied with those provisions.

75. Those stormwater and wastewater provisions on which we have not expressed a position, and which are not subject to any alternative, additional or consequential change to address an issue we have identified, are supported by Wellington Water as notified.
76. Finally, at the time of preparing this submission the new coalition government has signalled (through its coalition agreements) a number of changes to national policy direction on freshwater. These are likely to include replacement of the current National Policy Statement for Freshwater Management 2020 (NPS-FM) to “rebalance Te Mana o te Wai to better reflect the interests of all water users” and “allow district councils more flexibility in how they meet environmental limits”. In the shorter term, the government indicates it will “seek advice on how to exempt councils from obligations under the National Policy Statement for Freshwater Management 2020 as soon as practicable.” While the details of these signalled changes are not yet publicly available, for the purposes of this submission Wellington Water seeks all changes to PC1 that are necessary to give effect to changes to the NPS-FM or its application, should such changes be progressed while PC1 is being considered.

SECTION B: SPECIFIC SUBMISSION POINTS

Please refer to attached spreadsheet, which is in the format requested by Greater Wellington.

In general, and to the extent applicable, Wellington Water has intended to specify consistent or equivalent relief for the mirrored Te Whanganui-a-Tara and Te Awarua-o-Porirua provisions in PC1. If amendments to the provisions of one *whaitua* have inadvertently been omitted from another, Wellington Water seeks equivalent relief in respect of the equivalent provisions in each *whaitua*.

In some instances, the relief sought by Wellington Water in the “Decision Sought” column includes references to TAS and CWOs. To avoid doubt, the inclusion of such references is entirely subject to the resolution of Wellington Water’s overarching concerns with the CWOs and TAS as set out in Section A of this submission. If and to the extent that those concerns are not resolved, then Wellington Water would not support such references.

SECTION C: Provisions of relevance to network discharges and prioritisation

We submit that the matters to be considered when setting the prioritisation, or sequence, of sub-catchments should be listed (or cross-referred to) within:

- Policy WH.P13 (stormwater)
- Policy WH.P19 (wastewater)
- Policy P.P12 (stormwater)
- Policy P.P18 (wastewater)

There are a large number of existing and proposed provisions that specifically require prioritisation of certain matters, including scheduled sites, TAS, CWO, and mahinga kai. There are also provisions that have varying levels of requirement to ‘protect’, ‘meaningfully improve’, ‘progressively improve’, ‘avoid’ ‘restore’ ‘maintain’ ‘improve’, some within distinct (and different) timeframes and others within ‘reasonable timeframes’. Such provisions could be deemed to influence or complicate decision making on prioritisation methodologies for stormwater and wastewater network discharges, outside of those matters recommended to be included within the above listed provisions (refer to submission point in Section A: Overarching Submission Points).

The provisions we have identified are as follows (but not limited to):

PC1 Provisions:

Provision	Examples of wording within the provisions that may be considered to influence prioritisation methodologies
Objective WH.O2	‘measurable improvement’ ‘by 2040’ ‘meaningful progress’
Objective WH.O3	Coastal water objectives ‘by 2040’
Table 8.1	Target attribute states ‘by 2040’
Objective WH.O8	Target attribute state ‘by 2040’ – ‘maintained or improved’
Objective WH.O9	Target attribute state, Table 8.4 ‘to be met within timeframe (2040)’ ‘schedule B’ ‘improved’
Table 8.4	Target attribute state ‘by 2040’
Policy WH.P1	‘progressively reducing’, ‘enhancing’ ‘coordinating and prioritising work programmes in catchments’
Policy WH.P2	‘target attribute states’ ‘coastal water objectives’ ‘Freshwater action plans’
Policy WH.P3	‘freshwater action plans shall identify, in detail, the actions...to achieve target attribute states’
Policy WH.P4	‘visual clarity target attribute states’
Table 8.5	‘visual clarity target attribute states’, 2040 timeframe

Provision	Examples of wording within the provisions that may be considered to influence prioritisation methodologies
Policy WH.P13	'reducing copper and zinc', 'coastal water objectives' 'target attribute states' 'monitoring and modelling the stormwater network to identify catchments to be prioritised' 'prioritising...schedule A...schedule C ...or mahinga kai.'
Policy WH.P17	'maintained, or improved where degraded' 'target attribute states and coastal water objectives to be met by the timeframes set out in tables 8.1 and 8.4'
Policy WH.P18	'as soon as practicable...for the Escherichai coli target attribute to be achieved by the timeframe in Table 8.4' 'not unduly delating improvements because of uncertainty about...information available'
Policy WH.P19	'prioritising...where wet weather overflows are discharging to schedule A...schedule C...schedule H...primary contact sites...mahinga kai...group drinking water supplies...community drinking water supplies' 'target attribute states...Table 8.4...coastal water objectives...table 8.1'
Rule WH.R9	'progressively improve discharge quality...commensurate with what is required...to meet the target attribute state in Tables 8.4 of coastal water objectives in Table 8.1' 'measures to achieve any other relevant target attribute state or coastal water objectives' 'adverse effects... and particularly ...schedule A, schedule c, schedule G, schedule H'
Rule WH.R14	'reduction of Escherichia coli or enterococci commensurate with what is require...to meet the target attribute state in Table 8.4 or coastal water objective in Table 8.1' 'measures to achieve any other relevant target attribute state or coastal water objectives' 'adverse effects...schedule A, schedule B, schedule C, schedule H, primary contact sites, mahinga kai'
Objective P.O1	'wai ora by 2100'
Objective P.O2	'wai ora..2040' ' meaningfully improved' 'schedule b...maintained or improved' 'protection and restoration of sites with significant values'
Objective P.O3	'maintained or improved to achieve the coastal water objectives set out in Table 9.1, and by 2040' 'significantly reduced' 'mahinga kai has increased' 'macropyhtes are increased and improved'
Table 8.1	Coastal water objectives 'by 2040', N/A timeframe
Objective P.O6	'target attribute state...is not met, the state of that attribute is improved in all rivers and river reaches in the part Freshwater management Unit so that the target attribute state is met within the timeframe indicated within Table 9.2' 'schedule b'
Table 9.2	Target attribute states 'by 2040'
Policy P.P1	'prioritising work programmes in catchments'
Policy P.P2	'target attribute states and coastal water objectives will be achieved by regulating discharges...and non-regulatory methods, including Freshwater Action Plans'

Provision	Examples of wording within the provisions that may be considered to influence prioritisation methodologies
Policy P.P4	‘to achieve the coastal water objectives in table 9.1 the Plan will manage...discharge...to meet the sediment, zinc and copper load reductions for each harbour arm catchment set out in Table 9.3’ ‘2040’
Table 9.3	Coastal water objectives/target attribute states ‘by 2040’
Table 9.4	target attribute state ‘by 2040’
Policy P.P9	‘baseline water quality state for copper and zinc is maintained, or improved where degraded’ ‘coastal water objectives and target attribute states to be met by the timeframes set out in Tables 9.1 and 9.2’ ‘for the harbour arm catchments, this will include meeting the copper and zinc load reductions set out in Table 9.3’
Policy P.P12	‘reducing the copper and zinc loads in discharges to the coast water management units of Onepoto Arm and Pauatahanui Inlet in Map 82 and the harbour arm catchments in Map 84 by 15% for copper and 40% for zinc to contribute to meeting the target attribute states and coastal water objectives’ ‘reducing the concentration and contaminant loads of copper and zinc...to maintain, and in degraded Freshwater management Units improve the water quality state for dissolved copper and zinc’ ‘supporting the achievement of any other relevant target attribute states or coastal water objectives’ ‘monitoring and modelling...to identify catchments to be prioritised’ ‘prioritising the reduction, removal and/or treatment of stormwater discharges to schedule A...schedule C... or mahinga kai’
Policy P.P16	‘target attribute states and coastal water objectives to be met by the timeframes set out in Tables 9.1 and 9.2’
Policy P.P17	‘work shall be progressed as soon as practicable...for the Escherichia coli target attribute state to be achieved by the timeframe in Table 9.2’ ‘not unduly delaying improvements because of uncertainty’
Policy P.P18	‘prioritising the removal of wet weather overflows...discharging to schedule A, schedule c, schedule H and mahinga kai’ ‘contribute to meeting the target attribute states for Escherichia coli in Table 9.2 and coastal water objectives for enterococci as set out in Table 9.1’ ‘monitoring and modelling...to identify catchments to be prioritised’
Rule P.R8	‘including a reduction of copper and zinc commensurate ... to meet the target attribute state in Tables 9.2 or coastal water objective in Table 9.1 for the relevant part Freshwater Management Unit or coastal water management unit’ ‘matters to achieve any other relevant target attribute states of coastal water objectives’ ‘adverse effects...schedule A schedule C, schedule F, schedule H’ ‘the programme and timeframes for implementing measures’
Rule P.R13	‘reduction of Escherichia coli or enterococci commensurate with what is require...to meet the target attribute state in Table 8.4 or coastal water objective in Table 8.1’ ‘measures to achieve any other relevant target

Provision	Examples of wording within the provisions that may be considered to influence prioritisation methodologies
	attribute state or coastal water objectives' 'adverse effects...schedule A, schedule B, schedule C, schedule H, mahinga kai' 'the programme and timeframes for implementing measures'
Schedule 27	'identify timeframes...target attribute states will be met', 'outline a spatial or temporal prioritisation of actions'. In general the wording and contents of this schedule may have implications for prioritisation methodologies and implementation.
Schedule 31 and 32	Target attribute states. In general the wording and contents of these schedules may have implications for prioritisation methodologies and implementation and have been addressed in our overarching submission points.

Operative NRP Provisions (that have not been replaced by PC1):

Provision	Examples of wording within the provisions that may be considered to influence prioritisation methodologies
Objective O18 - only applies to natural wetlands in TWT and TAP	'improving water quality' 'reasonable timeframe'
Objective O19 – only applies to natural wetlands in TWT and TAP	'meaningfully improved' 'restoration' 'reasonable timeframe'
Objective O25 – objective applies to TWT and TAP but related tables do not	'schedule A' 'protected and restored'
Policy P69	'The discharge of contaminants to land is promoted over direct discharges to water, particularly where there are adverse effects on: (a) aquatic ecosystem health, or (b) mahinga kai, or (c) contact recreation, or (d) Māori customary use'
Policy P77 - doesn't apply to TWT and TAP	'... quality of fresh water bodies and coastal water shall be improved to meet, over time and as a minimum, the objectives in Table 3.1, 3.2 and 3.3, including by... improving water quality in Schedule H2 (priority water bodies) ... having particular regard to contact recreation and/or Māori customary use are adversely affected by discharges from stormwater networks...wastewater networks and wastewater treatment plants.'
Policy P85 – doesn't apply to TWT and TAP	'monitoring...in order to develop a prioritised programme for improvement...that will form the basis of a SMS'

Provision	Examples of wording within the provisions that may be considered to influence prioritisation methodologies
Policy P86 - doesn't apply to TWT and TAP	'identify priorities for progressive improvement and timeframes...in accordance with any relevant objectives...in the Plan'
Policy P91	'Mana whenua values and interests shall be reflected in the management of wastewater discharges to fresh and coastal water including adverse effects on Māori customary use, Ngā Taonga Nui a Kiwa, outstanding water bodies and mahinga kai.'
Policy P94	'New wastewater discharges to fresh water are avoided.'
Policy P95 - doesn't apply to TWT and TAP	'New discharges of treated wastewater to coastal water are discouraged...'
Rule R53 - doesn't apply to TWT and TAP	'in accordance with schedule N' 'in accordance with any relevant objectives' 'schedule A schedule B, schedule C, schedule F'
Rule R68 - doesn't apply to TWT and TAP	Discharge of wastewater from wastewater network – 'effects on wetlands, groundwater, surface water' 'Biological dissolved oxygen, total suspended solids, <i>E. Coli</i> ' 'effects on mana whenua, schedule A, schedule B, schedule C, schedule E, schedule F, schedule H' 'mahinga kai, maori customary use, aquatic ecosystem health'
Rule 93	All other discharges to sites of significance – 'in a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites) or Schedule H1 (contact recreation)...'
Rule R120	Activities in outstanding natural wetlands – discharge of water - 'schedule A3'
Schedule N- doesn't apply to TWT and TAP	Stormwater Management Strategy – 'prioritise' used throughout

Once you have completed your feedback, please email to regionalplan@gw.govt.nz

Please enter your details below	
* Submitter Name: Full name, or Name of Organisation / Company	Wellington Water Limited
Contact person for submission: (If different to above)	Victoria Buchanan
Telephone no: (Not required)	211960562
* Address for service: (Email, or physical address) Please note, an <u>email address</u> is the preferred method	victoria.buchanan@wellingtonwater.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	No
* I could gain an advantage in trade competition through this submission	No
Only answer this question if you answered 'yes' to the above question. I am directly affected by an effect of the subject matter of the submission that: A) adversely affects the environment; and B) does not relate to trade competition or the effects of trade competition	Select A or B
In providing a submission to Greater Wellington, I agree to having read and understood	
If providing a submission on behalf of a company / organisation I confirm that I have authority to do so:	Signature
Date:	15-Dec-23
Please enter your feedback in the next worksheet "2) Feedback on Provisions". All of the	

Chapter No and Name	Provision No. & Title	Stance	RMA Process	Reason for feedback:	Decision Sought *
		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 strikethrough , and insertions should be identified using bold .
2 Interpretation	2.2 Definitions		Both		
	Afforestation	Select stance	Freshwater		
	Allocation amount	Select stance	Part 1 Schedule 1		
	Annual stocking rate	Select stance	Freshwater		
	Catchment management unit	Select stance	Part 1 Schedule 1		
	Coastal water management units	Select stance	Part 1 Schedule 1		
	Containment standard	Support	Part 1 Schedule 1	This definition is supported as it is consistent with the approach taken in Wellington Water's applications to date	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	Select stance	Part 1 Schedule 1		
	Dry weather discharges	Amend	Part 1 Schedule 1	Wellington Water broadly supports this definition, but suggests minor changes to clarify that dry weather discharges and wet weather overflows are to be distinguished by their cause rather than whether or not it happens to be raining. It is technically possible to have a 'dry weather' overflow, e.g. due to a blockage, that occurs while there is some rainfall also occurring. Also, Wellington Water recommends that the cross connections aspect of this definition should be limited to those in public ownership.	Revise definition as follows: Constructed or uncontrolled discharges of wastewater from a wastewater network or stormwater network that are not attributable to wet occur during dry 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	Oppose	Part 1 Schedule 1	Wellington Water supports the proposed earthworks definition regarding the areas that fall outside Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua. The proposed definition for earthworks for Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua, removes the current earthworks exclusions. This will result in the requirement for a large number of consents for minor earthworks activities in these areas under Rule WH.R24, including the repair and maintenance of pipes and other three waters infrastructure. This is likely to have a significant and prohibitive impact on Wellington Water's ability to repair and maintain its network in a timely and cost effective manner.	Retain the proposed earthworks definition (outside Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua) across the full region and delete the earthworks definition which relates to Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua. Proposed definition revisions as follows: Earthworks For Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua only: The alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, and disturbance of land for the installation of fence posts. Except that, for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20, 'earthworks' has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017. For all other whaitua: The disturbance of a land surface from the time soil is first disturbed on a site until the time the site is stabilised. Earthworks includes blading, contouring, ripping, moving, removing, placing or replacing soil or earth, by excavation, or by cutting or filling operations, or by root raking. Earthworks do not include: (a) cultivation of the soil for the establishment of crops or pasture, and (b) the harvesting of crops, and 3 (c) thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and (d) the construction, repair, upgrade or maintenance of: (i) pipelines, and (ii) electricity lines and their support structures, including the National Grid, and (iii) telecommunication structures or lines, and (iv) radio
	Effective hectares	Select stance	Freshwater		
	Environmental outcomes	Select stance	Part 1 Schedule 1		
	Erosion and sediment management plan	Select stance	Freshwater		
	Erosion risk treatment plan	Select stance	Freshwater		
	Existing wastewater discharge	Support	Part 1 Schedule 1	See Section A in relation to definitions; Wellington Water supports the approach in clause (b) of the new text.	Retain as drafted, or ensure any changes to this definition keep it broad enough to include new (or newly identified) dry weather discharges from the existing wastewater network catchments, as well as wet weather discharge locations created as part of improvement works (e.g. new discharge points from attenuation tanks), or instances where an uncontrolled overflow point is replaced with a new constructed overflow point
	Harbour arm catchments	Select stance	Part 1 Schedule 1		

Harvesting	Select stance	Freshwater		
High risk industrial or trade premise	Amend	Part 1 Schedule 1	This definition is of particular interest to Wellington Water because discharges from such premises are excluded from the local authority stormwater network rules (WH.R9 and P.R8). Changes are sought to better align with Wellington Water's areas of control.	Amend this definition or add a note to ensure it includes: 1) sites in relation to which the relevant stormwater discharge consents have not been granted and/or applied for, and 2) sites that have been used for the listed purposes in the past, and still generate contaminants in stormwater, but which are not currently used for any of those purposes
Highest erosion risk land (plantation forestry)	Select stance	Freshwater		
Highest erosion risk land (pasture)	Select stance	Freshwater		
High erosion risk land (pasture)	Select stance	Freshwater		
Highest erosion risk land (woody vegetation)	Select stance	Freshwater		
Hydrological control	Oppose	Part 1 Schedule 1	It is understood that this definition will ultimately need to reflect the outcomes of the RPS process. Accordingly it is necessary for Wellington Water to reserve its position and oppose this definition. Also refer to comments in Section A.	Wellington Water seeks changes to this definition to ensure it is consistent with (or at least not inconsistent with) the RPS definition, and preserves flexibility for managing flows from small to large. Wellington Water would support standards based on a specified depth of rainfall retention (e.g. retention of the first 5mm of rainfall depth).
Impervious surfaces	Amend	Part 1 Schedule 1	Wellington Water broadly supports this definition, but needs to reserve its position as to the detail because there are likely to be some technical changes required. For example, the use of "stormwater" here is not consistent with how that term is defined in the NRP and some other terms are used inconsistently. Wellington Water is also concerned about how the exemptions for tanks and rainwater collection will impact the applicability of the stormwater rules.	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	Select stance	Freshwater		
Limit	Select stance	Part 1 Schedule 1		
Mechanical land preparation	Select stance	Freshwater		
Nationally threatened freshwater species	Select stance	Part 1 Schedule 1		
Nitrogen discharge risk	Select stance	Freshwater		
Part Freshwater Management Unit	Select stance	Freshwater		
Primary contact sites	Amend	Freshwater	Suggest that these would be better managed as part of Schedule H as it is very disjointed to separate these from the coastal recreation sites.	Consider combining the primary contact sites with the Schedule H recreation sites.
Recognised Nitrogen Risk Assessment Tool	Select stance	Freshwater		
Redevelopment	Amend	Part 1 Schedule 1	Wellington Water questions the way the examples are provided, particularly the use of 'etc', and also requests that the re-roofing of existing buildings exception does not apply to zinc or copper. Finally, breaking the chapeau into two sentences would make it easier to read.	Exclude zinc or copper roofs from the final exception clause Insert a full stop following the closing bracket, so that the new sentence starts: In relation to stormwater...
Registration	Select stance	Freshwater		
Registered forestry adviser	Select stance	Freshwater		
Replanting	Select stance	Freshwater		
Sacrifice paddocks	Select stance	Freshwater		
Small stream riparian programme	Select stance	Freshwater		
Stabilisation	Select stance	Part 1 Schedule 1		
Stormwater	Select stance	Part 1 Schedule 1		
Stormwater catchment or sub-catchment	Amend	Part 1 Schedule 1	This definition is confusing and needs to be revisited. In particular it is not clear whether the definition includes (or should expressly include) areas where stormwater is discharged to land or groundwater and what 'in the same vicinity' means. Would reference to maps be more effective?	Revise the definition for clarity.
Stormwater management strategy	Support	Part 1 Schedule 1	This definition is broadly supported, although Wellington Water suggests the new text specific to the two whitua could be reframed as a note or explanation as it is not worded as part of the definition. It may also be useful to define the phrase "water quality and quantity outcomes" to provide additional clarity	Retain as notified but consider adding new definitions for "Water quality and quantity outcomes".
Stormwater network	Support	Part 1 Schedule 1	This definition is supported	Retain as notified
Stormwater treatment system	Amend	Part 1 Schedule 1	Amend for clarity by deleting green infrastructure, which doesn't add anything, 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	Select stance	Freshwater		
Stock unit	Select stance	Freshwater		
Unplanned greenfield development	Select stance	Part 1 Schedule 1		

	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)	Select stance	Freshwater		
	Wastewater network catchment or sub-catchment	Support	Part 1 Schedule 1	This definition is supported	Retain as notified
	Wet weather overflows	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	Select stance	Part 1 Schedule 1		
	Winter Stocking rate	Select stance	Freshwater		
3 Objectives	Amendments to Chapter 3 - Objectives		Part 1 Schedule 1		
	Objective O2	Oppose	Part 1 Schedule 1	Retain as these benefits should be recognised regardless of the location	Retain the application of O2 in all locations.
	Objective O5	Oppose	Freshwater	Retain as this is important for source protection of drinking water.	Retain the application of O5 in all locations.
	Objective O6	Oppose	Part 1 Schedule 1	It is important to recognise the social, economic, cultural and environmental benefits of taking and using water are recognised, when managing water, and this position is not contrary to Te Mana o te Wai. Also see comments in Section A of Wellington Water's submission.	Retain the application of O6 in all locations and amend as follows: The social, economic, cultural and environmental benefits of: <ul style="list-style-type: none"> • Managing taking and using water are recognized • Managing stormwater for the safety of people and property • Disposing of wastewater to achieve public health outcomes are recognized and provided for when managing water.
	Objective O17	Select stance	Part 1 Schedule 1		
	Objective O20	Select stance	Part 1 Schedule 1		
	Objective O34	Select stance	Part 1 Schedule 1		
	Objective O35	Select stance	Part 1 Schedule 1		
	Objective O36	Select stance	Part 1 Schedule 1		
	Objective O37	Select stance	Part 1 Schedule 1		
	Objective O38	Select stance	Part 1 Schedule 1		
	3.6 Water quality		Part 1 Schedule 1		
	Objective O18: Rivers, lakes, natural wetlands and coastal water are suitable for contact recreation and Māori customary use.	Neutral	Part 1 Schedule 1	Retain, while further detail on Target Attribute States is developed	Retain application to all water bodies in all locations/whaitua
	Table 3.1 Primary contact recreation and Māori customary use objectives in freshwater bodies.	Neutral	Part 1 Schedule 1	Retain, while further detail on Target Attribute States is developed	Retain application to all relevant water bodies in all locations/whaitua
	Table 3.2 Secondary contact and Māori customary use recreation objectives in freshwater bodies.	Neutral	Part 1 Schedule 1	Retain, while further detail on Target Attribute States is developed	Retain application to all relevant water bodies in all locations/whaitua
	Table 3.3 Contact recreation and Māori customary use objectives in coastal water.	Neutral	Part 1 Schedule 1	Retain, while further detail on Target Attribute States is developed	Retain application to all relevant water bodies in all locations/whaitua
	3.7 Biodiversity, aquatic ecosystem health and mahinga kai		Part 1 Schedule 1		
	Objective O19: Biodiversity, aquatic ecosystem health and mahinga kai in fresh water bodies and the coastal marine area are safeguarded.	Neutral	Part 1 Schedule 1	Retain, while further detail on Target Attribute States is developed	Retain application to all water bodies in all locations/whaitua
	Table 3.4 Rivers and Streams.	Neutral	Part 1 Schedule 1	Retain, while further detail on Target Attribute States is developed	Retain application to all relevant water bodies in all locations/whaitua
	Table 3.5 Lakes.	Neutral	Part 1 Schedule 1	Retain, while further detail on Target Attribute States is developed	Retain application to all relevant water bodies in all locations/whaitua

	Table 3.6 Groundwater.	Neutral	Part 1 Schedule 1	Retain, while further detail on Target Attribute States is developed	Retain application to all relevant water bodies in all locations/whaitua
	Table 3.7 Natural wetlands.	Neutral	Part 1 Schedule 1	Retain, while further detail on Target Attribute States is developed	Retain application to all relevant water bodies in all locations/whaitua
	Table 3.8 Coastal waters.	Neutral	Part 1 Schedule 1	Retain, while further detail on Target Attribute States is developed	Retain application to all relevant water bodies in all locations/whaitua
	3.8 Sites with significant values		Part 1 Schedule 1		
	Objective O25: Outstanding water bodies identified in Schedule A (outstanding water bodies) and their significant values are protected and restored.	Oppose	Part 1 Schedule 1	Wellington Water opposes the note which disapplies Tables 3.4, 3.5, 3.6, and 3.8 from Whaitua Te Whanganui-a-tara and Te Awarua-o-Porirua.	Delete the note from Objective O25.
	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.	Oppose	Part 1 Schedule 1	Wellington Water opposes the note which disapplies Tables 3.4, 3.5, 3.6, and 3.8 from Whaitua Te Whanganui-a-tara and Te Awarua-o-Porirua.	Delete the note from Objective O28.
4 Policies			Part 1 Schedule 1		
	Policy P65: National Policy Statement for Freshwater Management requirements for discharge consents.	Select stance	Freshwater		
	Policy P70: Minimising effects of rural land use activities.	Select stance	Part 1 Schedule 1		
	Policy P71: Managing the discharge of nutrients.	Select stance	Part 1 Schedule 1		
	Policy P72: Priority Catchments.	Select stance	Freshwater		
	Policy P73: Implementation of farm environment plans in priority catchments.	Select stance	Freshwater		
	Policy P74: Avoiding an increase in adverse effects of rural land use activities and associated diffuse discharges of contaminants.	Select stance	Part 1 Schedule 1		
	Policy P76: Consent duration for rural land use in priority catchments.	Select stance	Part 1 Schedule 1		
	Policy P77: Improving water quality for contact recreation and Māori customary use.	Select stance	Part 1 Schedule 1		
	Policy P79: Quality of point source discharges to rivers.	Select stance	Freshwater		
	Policy P82: Avoiding inappropriate discharges to water.	Select stance	Part 1 Schedule 1		
	Policy P83: Minimising adverse effects of stormwater discharges.	Select stance	Part 1 Schedule 1		
	Policy P84: Managing land use impacts on stormwater.	Select stance	Part 1 Schedule 1		
	Policy P85: Development of a stormwater management strategy for first-stage local authority and state highway network consents.	Select stance	Part 1 Schedule 1		
	Policy P86: Second-stage local authority and state highway network consents.	Select stance	Part 1 Schedule 1		
	Policy P87: Minimising wastewater and stormwater interactions.	Select stance	Part 1 Schedule 1		

	Policy P88: Assessing resource consents to discharge stormwater containing wastewater.	Select stance	Part 1 Schedule 1		
	Policy P118: Water takes at minimum flows and minimum water levels.	Select stance	Freshwater		
	Policy P121: Core allocation for rivers.	Select stance	Freshwater		
	4.6 Biodiversity, aquatic ecosystem health and mahinga kai.		Part 1 Schedule 1		
	Policy P30: Biodiversity, aquatic ecosystem health and mahinga kai.	Select stance	Part 1 Schedule 1		
	Policy P36: Restoring Wairarapa Moana	Select stance	Part 1 Schedule 1		
	4.7.3 Sites with significant indigenous biodiversity value.		Part 1 Schedule 1		
	Policy P45: Protecting trout habitat.	Select stance	Part 1 Schedule 1		
	4.9.1 Discharges to land and water.		Part 1 Schedule 1		
	Policy P78: Managing point source discharges for aquatic ecosystem health and mahinga kai.	Select stance	Part 1 Schedule 1		
5.1 Air quality rules	5.1.2 Outdoor burning.		Part 1 Schedule 1		
	Rule R1: Outdoor burning – permitted activity.	Select stance	Part 1 Schedule 1		
	Rule R3: Outdoor burning for firefighter training – permitted activity.	Select stance	Part 1 Schedule 1		
	5.1.4 Large scale combustion activities.		Part 1 Schedule 1		
	Rule R7: Natural gas and liquefied petroleum gas – permitted activity.	Select stance	Part 1 Schedule 1		
	Rule R8: Diesel or kerosene blends – permitted activity.	Select stance	Part 1 Schedule 1		
	Rule R9: Biogas – permitted activity.	Select stance	Part 1 Schedule 1		
	Rule R10: Untreated wood – permitted activity.	Select stance	Part 1 Schedule 1		
	Rule R11: Coal, light fuel oil, and petroleum distillates of higher viscosity – permitted activity.	Select stance	Part 1 Schedule 1		
	Rule R12: Emergency power generators – permitted activity.	Select stance	Part 1 Schedule 1		
	5.1.5 Chemical and metallurgical processes.		Part 1 Schedule 1		
	Rule R14: Spray coating within an enclosed space – permitted activity.	Select stance	Part 1 Schedule 1		
	Rule R15: Spray coating not within an enclosed space – permitted activity.	Select stance	Part 1 Schedule 1		
	Rule R16: Printing processes – permitted activity.	Select stance	Part 1 Schedule 1		
	Rule R17: Dry cleaning – permitted activity.	Select stance	Part 1 Schedule 1		
	Rule R18: Fume cupboards – permitted activity.	Select stance	Part 1 Schedule 1		
	Rule R19: Workplace ventilation – permitted activity.	Select stance	Part 1 Schedule 1		
	Rule R20: Mechanical processing of metals – permitted activity.	Select stance	Part 1 Schedule 1		
	Rule R21: Thermal metal spraying – permitted activity.	Select stance	Part 1 Schedule 1		
	5.1.7 Dust generating activities.		Part 1 Schedule 1		
	Rule R25: Abrasive blasting within an enclosed booth – permitted activity.	Select stance	Part 1 Schedule 1		

Rule R26: Abrasive blasting outside an enclosed area – permitted activity.	Select stance	Part 1 Schedule 1		
Rule R27: Handling of bulk solid materials – permitted activity.	Select stance	Part 1 Schedule 1		
Rule R28: Cement storage – permitted activity.	Select stance	Part 1 Schedule 1		
5.1.8 Food, animal or plant matter manufacturing and processing.		Part 1 Schedule 1		
Rule R29: Alcoholic beverage production – permitted activity.	Select stance	Part 1 Schedule 1		
Rule R30: Coffee roasting – permitted activity.	Select stance	Part 1 Schedule 1		
Rule R31: Food, animal or plant matter manufacturing and processing – permitted activity.	Select stance	Part 1 Schedule 1		
5.1.9 Fuel storage		Part 1 Schedule 1		
Rule R33: Petroleum storage or transfer facilities – permitted activity.	Select stance	Part 1 Schedule 1		
5.1.10 Mobile sources.		Part 1 Schedule 1		
Rule R34: Mobile source emissions – permitted activity.	Select stance	Part 1 Schedule 1		
5.1.11 Gas, water and wastewater processes.		Part 1 Schedule 1		
Rule R35: Water and wastewater processes – permitted activity.	Amend	Part 1 Schedule 1	Should the reference to water processes be more specific, such as 'drinking water processes'?	Consider referring to 'drinking water processes'.
Rule R35A: Gas processes – permitted activity.	Select stance	Part 1 Schedule 1		
5.1.12 Drying and kiln processes.		Part 1 Schedule 1		
Rule R36: Drying and heating of minerals – permitted activity.	Select stance	Part 1 Schedule 1		
5.1.13 Discharge of agrichemicals.		Part 1 Schedule 1		
General conditions for the discharge of agrichemicals.	Select stance	Part 1 Schedule 1		
Rule R37: Handheld discharge of agrichemicals – permitted activity.	Select stance	Part 1 Schedule 1		
Rule R38: Motorised and aerial discharge of agrichemicals – permitted activity.	Select stance	Part 1 Schedule 1		
Rule R39: Agrichemicals not permitted – restricted discretionary activity.	Select stance	Part 1 Schedule 1		
5.1.14 Fumigation.		Part 1 Schedule 1		
Rule R40: Fumigation – permitted activity.	Select stance	Part 1 Schedule 1		
5.1.15 All other discharges		Part 1 Schedule 1		
Rule R42: All other discharges – discretionary activity.	Select stance	Part 1 Schedule 1		
5.2 and 5.3 Discharges to land and water and land use rules		Part 1 Schedule 1		
Rule R48: Stormwater from an individual property – permitted activity.	Select stance	Part 1 Schedule 1		
Rule R49: Stormwater from new subdivision and development – permitted activity.	Select stance	Part 1 Schedule 1		
Rule R50: Stormwater from new subdivision and development – restricted discretionary activity.	Select stance	Part 1 Schedule 1		
Rule R51: Stormwater to land – permitted activity.	Select stance	Part 1 Schedule 1		
Rule R52: Stormwater from a local authority or state highway network – controlled activity.	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.	Select stance	Part 1 Schedule 1		
	Rule R54: Stormwater from a port or airport – restricted discretionary activity.	Select stance	Part 1 Schedule 1		
	Rule R55: All other stormwater – discretionary activity.	Select stance	Part 1 Schedule 1		
	Rule R56: Water races – discretionary activity.	Select stance	Freshwater		
	Rule R57: Existing pumped drainage schemes – permitted activity.	Select stance	Part 1 Schedule 1		
	Rule R58: All other pumped drainage schemes – discretionary activity.	Select stance	Part 1 Schedule 1		
	Rule R65: Wastewater discharges to coastal and fresh water – discretionary activity.	Select stance	Part 1 Schedule 1		
	Rule R66: Discharges of wastewater to fresh water – non-complying activity.	Select stance	Freshwater		
	Rule R68: Discharge of treated wastewater from a wastewater network – restricted discretionary activity.	Select stance	Part 1 Schedule 1		
	Rule R101: Earthworks – permitted activity.	Select stance	Part 1 Schedule 1		
	Rule R102: Construction of a new farm track – permitted activity.	Select stance	Freshwater		
	Rule R103: Construction of a new farm track – controlled activity.	Select stance	Freshwater		
	Rule R104: Vegetation clearance on erosion prone land – permitted activity.	Select stance	Freshwater		
	Rule R105: Vegetation clearance on erosion prone land in accordance with a Freshwater Farm Plan – permitted activity.	Select stance	Part 1 Schedule 1		
	Rule R106: Earthworks and vegetation clearance for renewable energy generation – restricted discretionary activity.	Select stance	Freshwater		
	Rule R107: Earthworks and vegetation clearance – discretionary activity.	Select stance	Part 1 Schedule 1		
	Rule R110: Use of rural land in priority catchments – permitted activity.	Select stance	Freshwater		
	Rule R111: Use of rural land in priority catchments – controlled activity.	Select stance	Freshwater		
	Rule R112: Use of rural land in priority catchments – discretionary activity.	Select stance	Freshwater		
	5.4.4 Uses of beds of lakes and rivers general conditions.		Part 1 Schedule 1		

	Beds of lakes and rivers general conditions.	Amend	Part 1 Schedule 1	<p>Wellington Water support the protection of the habitat of native bird species and the outcome general condition 5.4.4(n) seeks to achieve.</p> <p>However, Wellington Water notes the amount of works that are undertaken as permitted activities by WWL (which are required to meet the relevant general conditions) to mitigate the potential effects on the receiving environment. For example, when a pipe with untreated wastewater bursts and is discharged into freshwater. In this scenario, activities are required to be undertaken immediately, in accordance with permitted and general conditions.</p> <p>This proposed amendment, as we understand, would require an ecologist to determine when the named birds are roosting, nesting or foraging, at a particular site. It would not be appropriate for this ecological assessment to be undertaken by the WWL planner assessing the general conditions. Because the time required to engage a third party to determine this period for a particular species (potentially many weeks) and deliver a written assessment, this proposed amendment to condition (n) has the potential to deliver adverse effects on the environment whilst this work is underway.</p> <p>In our view, there needs to be more certainty to plan users as to when works can occur, and when they cannot, and less reliance on a third party to provide certainty to plan users that they can meet the condition.</p>	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.
	5.4.5 Uses of beds of lakes and rivers.		Freshwater		
	Rule R128: New structures – permitted activity.	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.	Select stance	Freshwater		
	Rule R133: Gravel extraction for flood protection purposes or erosion mitigation inside sites of significance – discretionary activity.	Select stance	Freshwater		
	5.4.7 All other uses of the beds of lakes and rivers.		Part 1 Schedule 1		
	Rule R145: All other uses of river and lake beds – discretionary activity.	Select stance	Part 1 Schedule 1		
	5.4.8 Damming and diverting water		Freshwater		
	Rule R151A: Ongoing diversion of a river – permitted activity.	Support	Freshwater	Wellington Water supports the new permitted activity rule regards the ongoing diversion of a river. In particular, we support the approach that the ongoing diversion can only be considered permitted if all of the conditions of the resource consent to lawfully establish the diversion have been complied with.	No requested amendments
	5.5 Water allocation rules		Freshwater		
	Rule R152: Take and use of water – permitted activity.	Select stance	Freshwater		
	Rule R153: Farm dairy washdown and milk-cooling water – permitted activity.	Select stance	Freshwater		
	Rule R154: Water races – permitted activity.	Select stance	Freshwater		
	Rule R157: Take and use of water – controlled activity.	Select stance	Freshwater		
	Rule R158: All other take and use – discretionary activity.	Select stance	Freshwater		

6 Other methods	6.16 Freshwater Action Plan programme		Freshwater		
	Method M36: Freshwater Action Plan programme.	Amend	Freshwater	Refer to Section A of Wellington Water's submission	Relief necessary to provide clarification about interaction between local authority networks and the SMS and the matters raised in Section A
	Method M37: Freshwater Action Plan for the Parangarahu Lakes.	Select stance	Freshwater		
	Method M38: Freshwater Action Plan for the Rangituhi catchment.	Amend	Freshwater	Refer to Section A of Wellington Water's submission	Relief necessary to provide clarification about interaction between local authority networks and the SMS and the matters raised in Section A
	Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	Part 1 Schedule 1	Refer to Section A of Wellington Water's submission	Relief necessary to provide clarification about interaction between local authority networks and the SMS and the matters raised in Section A
	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	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.	Select stance	Freshwater		
	6.17 Small farm property registration		Freshwater		
	Method M42: Small farm property registration within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Select stance	Freshwater		
	6.16 Supporting improved water quality outcomes.		Part 1 Schedule 1		
	Method M43: Supporting the health of urban waterbodies.	Amend	Part 1 Schedule 1	Refer to Section A of Wellington Water's submission. Support the provision, with amendments 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. Also, it's inappropriate for Greater Wellington's plan to include a method that commits other parties to 'incentivising' or 'research and development'. 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 the stormwater and wastewater network discharge consents)	Retain method with amendments. The reference to Wellington Water Limited should be removed and replaced with 'relevant water utility operator' or 'territorial authorities' or similar. Remove reference to incentivising and research and development by other parties. Provide further options than tanks for hydrological controls. Add confirmation that Greater Wellington will be undertaking all state of the environment monitoring and modelling.
	Method M44: Supporting the health of rural waterbodies.	Select stance	Part 1 Schedule 1		
	Method M45: Funding of wastewater and stormwater network upgrades	Select stance	Part 1 Schedule 1		
8 Whaitua Te Whanganui-a-Tara	8.1 Objectives		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.	Amend	Part 1 Schedule 1	Achieving wai ora by 2100 as previously circulated is a significant task. Removing almost one quarter of the timeframe is unrealistic. It is unclear what the status of the note is - would it be better placed in the definitions? As currently drafted it creates duplication, since (for example) the third bullet point is replicated in WH.O4.	Alter timeframe to 2123. Clarify the status of the note.

	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.	Amend	Freshwater	The timeframe should be altered to 2060 as per Section A overarching submission points, the 2040 timeframe will likely render prioritisation of sub-catchments for improvement or upgrade meaningless and 17 years is considered insufficient to achieve required outcomes. Wellington Water supports the intent of measurable progress in clause (a). Clause (b) should have a maintenance component, rather than just improvement. Clause (b) should have a comma after 'stability'. Clauses (f) and (g) are very similar. They either need to be combined or better distinguished.	Alter timeframe to 2060. Clause (a): retain Clause (b): the hydrology of rivers and erosion processes, including bank stability, are maintained and improved where degraded and sources of sediment are reduced to a more natural level, and Clauses (f) and (g): either combine or better distinguish
	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.	Oppose	Part 1 Schedule 1	The timeframe should be altered to 2060 as per Section A overarching submission points: 2040 timeframe will likely render prioritisation of sub-catchments for improvement or upgrade meaningless and 17 years is considered insufficient to achieve required outcomes. In relation to the CWO contained in Table 8.1, these are considered generally appropriate parameters for coastal environmental health, however the lack of information relating to baseline states for Coastal Water Management Units and timeframes to meet the requirements makes it difficult to determine whether improvement can be measured (refer also Section A overarching submission points). In clause (b) 'high contaminant concentrations' should be better defined so parties clearly understand the work involved and when this clause is relevant. Where improvement is required for the Coastal Water Objectives, the requirement should be that the Objective has been achieved or meaningful progress has been made – similar to clause WH.O2(a). Clauses (g) and (h) are very similar. They either need to be combined or better distinguished.	Further detail is required in relation to the baseline states and required timeframes in both this objective and Table 8.1. Provide maps showing locations of high contaminant concentrations. Amend objective to provide this further detail. In addition to the above, amend as follows: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained, or improved or meaningful progress has been made towards improvement to achieve the coastal water objectives set out in Table 8.1, and by 2040 2060 . In clause (b) 'high contaminant concentrations' should be better defined Clauses (g) and (h): either combine or better distinguish between the clauses
	Table 8.1 Coastal water objectives.	Oppose	Part 1 Schedule 1	Table 8.1 lacks the required information to set baseline states for the Coastal Water Management Units to assess whether the state is being maintained or improved. Table 8.1 also lacks timeframes for when the baseline will be determined.	Alter timeframe to 2060. Further detail is required in relation to the baseline states and required timeframes. As such, Wellington Water seeks that this table is withdrawn until such detail can be added.
	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.	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.	Select stance	Freshwater		
	Table 8.2 Target attribute states for lakes.	Select stance	Freshwater		
	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	Select stance	Freshwater		
	Objective WH.O7: The physical integrity of aquitards is protected so that confined aquifer pressures are maintained.	Select stance	Freshwater		
	Objective WH.O8: Primary contact sites within Te Awa Kairangi/Hutt River, Pākuratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact.	Amend	Freshwater	The timeframe should be altered to 2060 as per Section A overarching submission points, the 2040 timeframe will likely render prioritisation of sub-catchments for improvement or upgrade meaningless and 17 years is considered insufficient to achieve required outcomes.	Alter timeframe to 2060
	Table 8.3 Primary contact site objectives in rivers.	Select stance	Freshwater		

	Objective WH.09: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Amend	Freshwater	Refer to Section A overarching submission points for additional context regarding prioritisation and target attribute states, and comments on Table 8.4 below. Clause (a): needs to refer to 'meaningful progress' as specified by WH.02(a). Clause (d): Huanga needs to refer to Schedule B to provide certainty for applicants. There appears to be a typo (not sure what it should say).	Revise clause (a) as follows: 'where a target attribute state in Table 8.4 is not met, the state of that attribute is improved in all rivers and river reaches in the part Freshwater Management Unit so that the target attribute state is met within the timeframe indicated within Table 8.4, or meaningful progress has been made and ' Link huanga with Schedule B and improve wording.
	Table 8.4: Target attribute states for rivers.	Oppose	Freshwater	Refer to Section A overarching submission points. There is a general lack of information relating to the baseline state to measure against, meaning it is not possible to determine whether the TAS parameters and requirements are reasonable, appropriate and achievable. It is considered likely that the 2040 timeframe will result in the requirement for a large proportion of sub-catchments (or possibly all of them) to be upgraded in the short term, rendering prioritisation of sub-catchment upgrades meaningless. Refer following comments in relation to specific parameters within Table 8.4.	Further information is required on the baseline state, and a detailed assessment of the implications of the TAS provisions is required on a sub-catchment basis. Alter timeframe to 2060. PC1 should include guidance on how to measure the proportion from WWL's networks with inputs from other sources within the catchment. Wellington Water seeks that this table is withdrawn until further detail can be added.
	Table 8.4: Target attribute states for rivers.	Oppose	Freshwater	Periphyton Biomass 1) Periphyton biomass is dependent on a range of environmental and human factors including shading, nutrient concentrations and sedimentation rates. Tackling these factors will require a process to identify the relevant factors and required actions further than those under WWL's control. 2) At certain sites there is a lack of data for the setting of baselines. There is uncertainty therefore whether achieving the TAS by 2040 is realistic and achievable. 3) Natural conditions and land uses and activities within the catchment may prevent a TAS being achieved. This could include shading, stream bed type and channelisation.	Further information is required on the baseline state, and a detailed assessment of the implications of the TAS provisions is required on a sub-catchment basis. As such, Wellington Water seeks that this table is withdrawn until such detail can be added.
	Table 8.4: Target attribute states for rivers.	Oppose	Freshwater	E coli There will be other forms of faecal bacteria contamination within catchments, eg. rural inputs (managed through P.P20 & P.P24), on-site wastewater treatment and from birds or dogs. Recognise that WWL's assets will not be the only factor which determines if the TAS is met.	PC1 should include guidance on how to measure the proportion from WWL's networks relative to inputs from other sources within the catchment. Further analysis is required to determine whether improvements are achievable. As such, Wellington Water seeks that this table is withdrawn until such detail can be added. As such, Wellington Water seeks that this table is withdrawn until such detail can be added.
	Table 8.4: Target attribute states for rivers.	Oppose	Freshwater	Fish/Fish Community Health 1) The abundance and type of fish species is dependent on a range of environmental and human factors. Tackling these factors will require a process to identify the relevant factors and required actions further than those under WWL's control. 2) At all sites there is a lack of data for the setting of baselines. The required improvements may be unrealistic for these sites by 2040 3) Natural conditions and land uses and activities within the catchment may prevent a TAS being achieved. This could include through invasive species, the temperature of watercourses, channelization and barriers to fish passage. 4) Once any required improvements have been made to a catchment it can take a period of time for this to be observed in an improvement in fish abundance and diversity (Membrane (2022)).	Further information is required on the baseline state, and a detailed assessment of the implications of the TAS provisions is required on a sub-catchment basis. As such, Wellington Water seeks that this table is withdrawn until such detail can be added.

	Table 8.4: Target attribute states for rivers.	Oppose	Freshwater	<p>Macroinvertebrates</p> <p>1) The abundance and diversity of macroinvertebrate species is dependent on a range of environmental and human factors. Tackling these factors will require a process to identify the relevant factors and required actions further than those under WWL's control.</p> <p>2) At some sites there is a lack of data for the setting of baselines. The required improvements may be unrealistic for these sites by 2040.</p> <p>3) Natural conditions and human land uses and activities within the catchment may prevent a TAS being achieved. This could include through invasive species, the temperature of watercourses, channelization and lack of habitat.</p> <p>4) Once any required improvements have been made to a catchment it can take a period of time for this to be observed in an improvement in macroinvertebrate abundance and diversity (Collier et al., 2002)</p>	Further information is required on the baseline state, a detailed assessment of the implications of the TAS provisions is required on a sub-catchment basis and any other changes necessary to satisfactorily address the issues raised.
	Table 8.4: Target attribute states for rivers.	Oppose	Freshwater	<p>Suspended fine sediment/deposited fine sediment</p> <p>There is uncertainty regarding the modelled correlation between sediment loads and visual clarity.</p> <p>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.</p> <p>Furthermore, sediment loads, visual clarity and deposited sediment are influenced by factors within catchments outside of WWL's control. Human land uses and activities can significantly influence sediment loads within a catchment. Natural factors such as geology, slope and rainfall will influence the quantity of sediment within a catchment</p>	TAS for 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
	Table 8.4: Target attribute states for rivers.	Oppose	Freshwater	<p>Dissolved oxygen mg/L (below point sources only)</p> <p>There is a lack of data for the setting of baselines. The required improvements may be unrealistic for these sites by 2040.</p>	Guidance needs to be provided on when baseline states will be set and mitigation provided should the set TAS be shown to be unrealistic when a baseline is determined. As such, Wellington Water seeks that this table is withdrawn until such detail can be added.
	Table 8.4: Target attribute states for rivers.	Oppose	Freshwater	<p>Dissolved organic nitrogen/dissolved reactive phosphorus</p> <p>Assessment of the implications of these TAS's requires considerable input from a wide variety of stakeholders and additional assessment.</p>	Further information is required on the baseline state, and a detailed assessment of the implications of the TAS provisions is required on a sub-catchment basis. As such, Wellington Water seeks that this table is withdrawn until such detail can be added.
	Table 8.4: Target attribute states for rivers.	Oppose	Freshwater	<p>Dissolved copper/dissolved zinc</p> <p>Policy P.P9 policy requires stormwater to be managed so that the baseline water quality state for copper and zinc is maintained or (where necessary) improved. This does not recognise the other sources of zinc and copper outside of WWL's control (e.g. zinc roofs, copper based brake disks). Such required changes will require an approach outside of WWL's control and will take years and significant investment to enact, and may not have occurred by 2040.</p> <p>The TAS is for dissolved copper and dissolved zinc can be more challenging to remove through stormwater treatment devices than total copper and total zinc.</p>	Policy P.P9 needs to be amended and the table updated to reflect this. Wellington Water seeks that this table is withdrawn until such detail can be added.
	Table 8.4: Target attribute states for rivers.	Oppose	Freshwater	<p>Ecosystem metabolism</p> <p>Table 8.4 notes that further monitoring is needed to define the baseline state and develop the attribute state framework</p>	Further information on how the Ecosystem metabolism will be monitored and a baseline set is required. As such, Wellington Water seeks that this table is withdrawn until such detail can be added.
	Table 8.4: Target attribute states for rivers.	Oppose	Freshwater	<p>Ammonia (toxicity)</p> <p>It should be noted that external factors, such as activities and land use in the catchments may lead to failure of TAS outside of WWL's control.</p>	PC1 should include guidance on how to measure the proportion from WWL's networks with inputs from other sources within the catchment. As such, Wellington Water seeks that this table is withdrawn until such detail can be added.
	Table 8.4: Target attribute states for rivers.	Oppose	Freshwater	<p>Nitrate (toxicity)</p> <p>It should be noted that external factors, such as activities and land use in the catchments may lead to failure of TAS outside of WWL's control.</p>	PC1 should include guidance on how to measure the proportion from WWL's networks with inputs from other sources within the catchment. As such, Wellington Water seeks that this table is withdrawn until such detail can be added.
	8.2 Policies		Both		
	Policy WH.P1: Improvement of aquatic ecosystem health.	Amend	Part 1 Schedule 1	<p>Clause (a): Support the reference to 'progressively reducing the load' as reflecting the volume of work that needs to be achieved.</p> <p>Clause (c): replace 'enhancing' with 'maintaining or improving' as not all locations will require enhancement.</p> <p>Clause (d): define or use a more specific term for 'work programmes' to clarify that it does not relate to local authority networks.</p>	<p>Retain clause (a)</p> <p>Clause (c): replace 'enhancing' with 'maintaining or improving'.</p> <p>Clause (d): define or use a more specific term for 'work programmes' to clarify that it does not relate to local authority networks</p>

	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	Part 1 Schedule 1	Refer to Section A overarching submission points. There is a general lack of information relating to the baseline state to measure against, meaning it is not possible to determine whether the TAS and CWO parameters and requirements are reasonable, appropriate and achievable. It is also unclear how the TAS, CWO and Freshwater Action Plans will impact upon sub-catchment prioritisation of improvements required for stormwater and wastewater discharges. clause (b): is too vague. It needs to clearly state that redevelopment in existing urban areas will be encouraged as that provides opportunities to reduce the existing contaminant load, and that redevelopment—when it occurs—will be required to reduce the existing contaminant load. clause (c): needs to make allowance for stormwater discharges that are not creating streambank erosion.	Wellington Water requests clarification from Greater Wellington regarding how the FAP provisions will work alongside existing TAS provisions, network discharge consent provisions, and in particular Schedules 31 and 32. Please provide clarity over relationship between 'non-regulatory methods' and 'work programmes'. The policy should then be amended to the extent necessary to appropriately reflect these interrelationships. In addition to the above, amend provisions as follows: (b) encouraging and where appropriate, requiring that redevelopment activities within existing urban areas to shall reduce the existing urban contaminant load, and (c) imposing hydrological controls on: (i) urban development and (ii) where appropriate and practicable, stormwater discharges to rivers in relation to streambank erosion
	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Amend	Freshwater	Refer to Section A overarching submission points. Wellington Water is unclear on how the FAPs are intended to operate alongside other provisions within the plan change, Wellington Water stormwater and wastewater network discharge consents, and in general Wellington Water's network operations. The current provisions for FAPs, although a non-regulatory 'other method', could be read to have some level of influence in relation to wastewater and stormwater network discharge consents and prioritisation of sub-catchments.	Wellington Water requests clarification from Greater Wellington regarding how the FAP provisions will work alongside existing TAS provisions, network discharge consent provisions, and in particular Schedules 31 and 32. The policy should then be amended to the extent necessary to appropriately reflect these interrelationships. We also request that Greater Wellington clarify what is intended for the level of consideration or influence that any FAP could have on wastewater and stormwater network discharge consents, noting that Wellington Water considers that there should be no relationship between the contents of an FAP and the scheduled requirements for network discharge consents.
	Policy WH.P4: Achievement of the visual clarity target attribute states.	Amend	Freshwater	Refer to Section A overarching submission points and comments in relation to Table 8.5 below. A detailed assessment of the implications of the TAS provisions is required on a sub-catchment basis to determine appropriateness of the requirements and 2040 timeframes, and implications for sub-catchment prioritisation.	Amendments to address the issues identified in Section A of our submission. Also refer to comments in relation to Table 8.5 below.
	Table 8.5: Sediment load reductions required to achieve the visual clarity target attribute states.	Amend	Freshwater	Refer to Section A overarching submission points. A detailed assessment of the implications of the TAS provisions is required on a sub-catchment basis to determine appropriateness of the requirements and 2040 timeframes, and implications for sub-catchment prioritisation There is uncertainty regarding the modelled correlation between sediment loads and visual clarity and further assessment is needed. 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 sediment are influenced by factors within catchments outside of WWL's control. Human land uses and activities can significantly influence sediment loads within a catchment. Natural factors such as geology, slope and rainfall will influence the quantity of sediment within a catchment.	Refer to Section A overarching submission points. Amend timeframe to 2060 TAS for 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 Wellington Water seeks that this table is withdrawn until such detail can be added.
	Policy WH.P5: Localised adverse effects of point source discharge.	Select stance	Part 1 Schedule 1		
	Policy WH.P6: Cumulative adverse effects of point source discharges.	Amend	Part 1 Schedule 1	The exclusion of stormwater and wastewater needs to be very explicit.	Amend policy as follows: The cumulative adverse effects of For point source discharges to water, excluding other than stormwater network and wastewater discharges, to water cumulative adverse effects are avoided and: OR in the alternative, define "point source discharge" so that it clearly excludes discharges from wastewater and stormwater networks
	Policy WH.P7: Discharges to groundwater.	Select stance	Freshwater		
	Policy WH.P8: Avoiding discharges of specific products and waste.	Amend	Part 1 Schedule 1	Wellington Water fully supports the intent of this policy and associated rule. However, we are concerned about how it may impact on our stormwater and wastewater discharges and suggest an addition at the end of the policy	Amend policy as follows: ... Noting that this policy does not apply to contaminants collected as part of stormwater management in response to precipitation or part of the operation of the wastewater network.

	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Amend	Part 1 Schedule 1	It is not possible to maintain baseline states if it is not clear what they are. The reference to table 8.1 should be deleted because it contains no relevant information. The policy could be interpreted as stormwater discharges being the only cause of heavy metal targets not being met, which is not correct. The timeframes in Table 8.4 should refer to 2060 rather than 2040.	Amend policy as follows: Stormwater discharges to a surface water body or coastal water, or into or onto land in a manner that may enter freshwater or coastal water, are managed to support, in a commensurate manner, so that the baseline water quality state for copper and zinc is being maintained, or improved where degraded, including in the relevant part Freshwater Management Unit or coastal water management unit , in order for the coastal water objectives and target attribute states to be met by the timeframes set out in Tables 8.1 and 8.4 . Define "commensurate" as set out in definitions below (refer Section A overarching submission points).
	Policy WH.P10: Managing adverse effects of stormwater discharges.	Amend	Part 1 Schedule 1	For clause (a), 'maximise' already has a practicability component to it in the definitions.	Amend policy as follows: (a) using source control to minimise contaminants in the stormwater discharge and maximise, to the extent practicable , the removal of contaminants from stormwater, including through the use of water sensitive urban design measures, and
	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Support	Part 1 Schedule 1	Wellington Water supports this provision as achieving positive outcomes for water quality.	retain
	Policy WH.P12: Managing stormwater from a port or airport.	Select stance	Part 1 Schedule 1		
	Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy.	Amend	Part 1 Schedule 1	Refer also overarching submission points in Section A, particularly in relation to prioritisation, TAS, modelling and monitoring. Clause (a): Support the focus on copper and zinc Clause (b): reference to concentrations needs to be deleted Clause (c): range of target attribute states is too wide and creates uncertainty for Wellington Water Clause (e): The focus should be on modelling to determine the necessary copper and zinc load reduction in stormwater discharges. We oppose the stormwater network modelling component of clause (e) as we will not model the network in its entirety ahead of starting work on subcatchments. The reference to concentrations needs to be deleted and there is no point running a CLM model after implementation because it will provide the same information as pre-implementation. We oppose the requirement in (e) to monitor concentrations in network discharge as concentrations are more relevant for receiving waters. Loads are more appropriate for network discharges. It is unclear how the prioritisation component of (e) will align with clause (f). Clause (f): the plan sets many different priorities in different provisions making all the prioritisation meaningless. In addition, it is unclear how clauses (e) and (f) would interact. Wellington Water has proposed a replacement. The plan appears to use the different terms that mean the same thing, for example, in this policy: (i) 'Contribute to' (ii) 'Supporting the achievement of' Its unclear whether these terms are intended to be applied in the same	Amend policy as follows: Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy Stormwater discharges from local authority and state highway networks shall be managed by: (a) reducing the copper and zinc loads in discharges to coastal water management units to contribute to meeting the coastal water objectives to maintain or improve, and (b) reducing the concentration and contaminant loads of copper and zinc from discharges to surface water bodies in order to maintain, and in degraded part Freshwater Management Units improve, the water quality state for dissolved copper and zinc to contribute to meeting the target attribute states in those part Freshwater Management Units, and (c) supporting the achievement of any other relevant target attribute states or coastal water objectives including for ecosystem health, nutrients, visual clarity and Escherichia coli or enterococci, and (d) implementing a stormwater management strategy and stormwater management plans prepared in accordance with the information and requirements set out in Schedule 34 (stormwater strategy—whaitua), and (e) monitoring and modelling the stormwater network to identify catchments to be prioritised, the copper and zinc concentrations and loads in the discharge, and changes in discharge volume and quality over time following improvements in the network infrastructure, and (f) prioritising the reduction, removal, and/or treatment of stormwater discharges to Schedule A (outstanding water bodies) or Schedule C (mana-whenua) sites, or mahinga kai. Stormwater discharges from local authority and state highway networks shall be managed by: (a) reducing the copper and zinc loads in discharges to coastal water management units to contribute to meeting the coastal water objectives to maintain or improve, and (b) reducing the contaminant loads of copper and zinc from discharges to surface water bodies in order to maintain, and in degraded part Freshwater Management Units improve, the water quality state for dissolved copper and zinc to contribute to meeting the target attribute states in those part Freshwater Management Units, and
	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Part 1 Schedule 1	Wellington Water supports the intent of this policy, but is not yet sure if a mean annual runoff target is the most appropriate measure. We query whether this should be mean rather than median, and also how easy this will be for developers or Wellington Water to assess compliance. It may be that ready made 'acceptable solutions' are easier to implement. As such Wellington Water reserves its position on the details of this policy.	Review this policy and in particular the reference to mean annual runoff, in order to ensure that the policy imposes targets that are readily measurable, able to be easily implemented, and clearly relate to the effects of runoff on the environment.
	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Support	Part 1 Schedule 1	Wellington Water supports this provision as achieving freshwater quality outcomes	
	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Select stance	Part 1 Schedule 1		

	Policy WH.P17: General wastewater policy to achieve target attribute states and coastal objectives.	Oppose	Part 1 Schedule 1	Refer to Section A overarching submission points and comments further on in this submission on Tables 8.1 and 8.4. The policy could be interpreted as wastewater discharges being the only cause of <i>E.Coli</i> targets not being met, which is not correct.	Further information is required on the baseline state, and a detailed assessment of the implications of the TAS provisions is required on a sub-catchment basis. PC1 should include guidance on how to measure the proportion from WWL's networks with inputs from other sources within the catchment. In addition to the further information requested above and incorporation of this information into the provisions, it is also requested that the policy is revised to reflect the proportionate effect of discharges, as follows:
	Policy WH.P18: Progressing works to meet <i>Escherichia coli</i> target attribute states.	Oppose	Freshwater	Purpose of policy is unclear and it should be deleted. It also implies that wastewater networks are the only source of <i>e coli</i> . Also refer to comments on prioritisation in Section A	Deletion of Policy WH.P18
	Policy WH.P19: Managing wastewater network catchment discharges.	Amend		Also refer to Section A overarching submission points on modelling and prioritisation. Wellington Water is not able to model <i>E. coli</i> or enterococci concentrations or load, and instead must use the wet weather volume and frequency as a proxy for this. The policy should only relate to discharges within the public network. Discharges from privately owned wastewater pipes should not be included. Clauses (a), (c), (g) and (h): frequency is a more appropriate metric than volume for wastewater overflows in the network. References to volume should be deleted. Clause (a): It is unclear whether wet weather overflows are related to target attribute states and coastal water objectives. For example, policies WH.P19 and P.P18 direct that wet weather overflows are reduced to meet or exceed the containment standard. However other provisions (e.g Schedule 32) suggest that wet weather overflows are relevant to target attribute states and coastal water objectives. Wellington Water supports the focus on containment standard. Clause (b): please refer to Section A regarding prioritisation and how the plan renders it meaningless. It is not clear how this would work with clause (h). Wellington Water proposes another approach to prioritisation. Clause (c) the reference to 'potential' discharges is unclear and so should be deleted.	Remove references to monitoring and modelling in this context. Amend provisions as follows: Policy WH.P19: Managing wastewater network catchment discharges All wastewater network catchment discharges, including those which discharge via a stormwater network, shall be managed by:- progressively reducing the frequency and/or volume of wet weather overflow events to meet or exceed the containment standard of no more than 2 per year through the implementation of the methodologies set out in a Wastewater Network Catchment Improvement Strategy prepared in accordance with Schedule 32 (wastewater strategy), and- (a) Prioritising the removal of wet weather overflows in wastewater network sub-catchments— where wet weather overflows are discharging to Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule H (contact recreation and Māori customary use) sites, and primary contact sites in Map 85, and mahinga kai, or where they may affect group drinking water supplies and community drinking water supplies, and- (b) Progressively reducing the frequency and/or volume of dry weather discharges or the potential for these discharges through the implementation of a Wastewater Network Catchment Improvement Strategy prepared in accordance with Schedule 32 (wastewater strategy) to contribute to meeting the target attribute states for <i>Escherichia coli</i> in Table 8.4 and the coastal water objectives for enterococci in Table 8.1, and- (c) Implementing an inflow and infiltration programme to proactively upgrade the pipe network to progressively reduce stormwater and groundwater infiltration and inflow into the wastewater
	Policy WH.P20: Managing existing wastewater treatment plant discharges.	Amend	Part 1 Schedule 1	The policy will disincentivise long outfalls as there is no recognition of the benefits of pollution dispersal, the receiving environment (depth and turbulence) and ecology. Coastal environments are not subject to bottom lines and limits pursuant to the NPS-FM and therefore a more lenient approach can be applied. Currently, all our wastewater activities seem to be subject to improvement, regardless of whether the improvement is warranted or not. A more focused approach to Plan Change 1 would be beneficial. Wellington Water considers that its WWTP discharges to marine environments have limited impact on the environment and should be enabled. Clause (a): The requirement to maintain the enterococci load for coastal water should be altered to: continue to meet the coastal water objective. Clause (f): why does mahinga kai need to be monitored within the zone of reasonable mixing? It should only be at the outer extent. Note: the directiveness of the note is unusual and we suggest it would work better as part of clause (c) within the policy.	Delete and replace with policy that: <ul style="list-style-type: none">Recognises the benefits of WWTPs and their limited impacts on the environmentRecognises the differences between coastal and freshwater environmentsEnables consideration of the benefits of dispersal, environmental effects and receiving environment rather than just treating all discharges the sameMaintains clause (c) and builds in kaitiaki monitoring, rather than relying on a noteRemove the requirement for mahinga kai monitoring in the zone of reasonable mixing
	8.2.4 Rural land use and earthworks		Both		
	Policy WH.P21: Managing diffuse discharges of nutrients and <i>Escherichia coli</i> from farming activities.	Select stance	Freshwater		

	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Select stance	Freshwater		
	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Select stance	Freshwater		
	Policy WH.P24: Phasing of farm environment plans.	Select stance	Part 1 Schedule 1		
	Policy WH.P25: Managing rural land use change.	Select stance	Freshwater		
	Policy WH.P26: Managing livestock access to small rivers.	Select stance	Freshwater		
	Policy WH.P27: Promoting stream shading.	Select stance	Freshwater		
	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	Select stance	Freshwater		
	Policy WH.P29: Management of earthworks.	Select stance	Part 1 Schedule 1		
	Policy WH.P30: Discharge standard for earthworks.	Select stance	Part 1 Schedule 1		
	Policy WH.P31: Winter shut down of earthworks.	Amend	Part 1 Schedule 1	This is excessive given the scale of work that needs to be delivered for Te Mana o te Wai (refer to deliverability in Section A). An exemption is required for Regionally Significant Infrastructure	Provide an exemption for Regionally Significant Infrastructure.
	8.2.5 Water allocation		Freshwater		
	Policy WH.P32: Minimum flows and minimum water levels in Whaitua Te Whanganui-a-Tara.	Select stance	Freshwater		
	Policy WH.P33: Core allocation in Whaitua Te Whanganui-a-Tara.	Select stance	Freshwater		
	8.3 Rules		Both		
	8.3.1 Discharges of contaminants		Part 1 Schedule 1		
	Rule WH.R1: Point source discharges of specific contaminants – prohibited activity.	Amend	Part 1 Schedule 1	Wellington Water fully supports the intent of this rule and associated policy. However, we are concerned about how it may impact on our stormwater and wastewater discharges and suggest an addition at the end of the rule.	Add new clause to the end of the existing rule as follows: ... Noting that this rule does not apply to the discharge of contaminants collected as part of stormwater management as a result of precipitation or part of the operation of the wastewater network. OR as alternative relief, define "point source discharge" so as to exclude discharges from the <u>stormwater wastewater networks</u>
	8.3.2 Stormwater		Both		
	Rule WH.R2: Stormwater to land – permitted activity.	Support	Freshwater	Wellington Water supports this approach	
	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water – permitted activity.	Select stance	Part 1 Schedule 1		
	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity.	Amend	Part 1 Schedule 1	Wellington Water is concerned that (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.	Amend Rule as follows: ... and where the discharge is not via an existing local authority stormwater network the discharge shall also not:-
	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	Amend	Part 1 Schedule 1	Clause (c) is too vague as it does not specify what the hydrological controls have to achieve. Wellington Water seeks that compliance with a rainfall depth is required Wellington Water is concerned that (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.	Greater specificity in clause (c), including a requirement to retain a specific depth of rainfall. Delete the following clause: and where the discharge is not via an existing local authority stormwater network the discharge shall also not:-
	Rule WH.R6: Stormwater from new greenfield impervious surfaces – controlled activity.	Amend	Part 1 Schedule 1	Is clause (e) missing a word after 'mean annual runoff' such as 'volume' or 'load'?	Consider if clause (e) requires an extra word.

	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas – controlled activity.	Support	Part 1 Schedule 1		
	Rule WH.R8: Stormwater from a port or airport – restricted discretionary activity.	Select stance	Part 1 Schedule 1		
	Rule WH.R9: Stormwater from a local authority or state highway network–restricted discretionary activity.	Amend	Part 1 Schedule 1	<p>Wellington Water is concerned that the Rule as drafted is extremely hard to satisfy, meaning that applications will become non-complying activities with avoid policies in place.</p> <p>For the same reason R93 should be added to the list of provision that will no longer apply to Whaitua Te Whanganui-a-Tara or Te Awarua-o-Porirua Whaitua.</p> <p>The matters of discretion need to avoid duplication with Schedule 32.</p> <p>We also consider that the matters of discretion are uncertain, 'in accordance with' is not a matter of fact. Nor can Wellington Water advise whether its strategy will definitively achieve the commensurate reductions</p> <p>There is duplication between clauses (1) and (2)-(9) and many of these clauses are unclear.</p> <p>Refer to Section A for additional context regarding prioritisation, target attribute states, modelling and monitoring.</p>	<p>Provisions to be revised as follows:</p> <p>Rule WH.R9: Stormwater from a local authority or state highway network –restricted- discretionary activity The discharge of stormwater into water, or onto or into land where it may enter water, from a local authority or state highway stormwater network, including discharges via another stormwater network, except those from a high risk industrial or trade premise, or ports and airports, is a restricted discretionary activity, provided the resource consent application includes a stormwater management strategy prepared in accordance with Schedule 31 (stormwater strategy – whaitua) to progressively improve discharge quality, including a reduction of copper and zinc commensurate with what is required in the receiving environment to meet the target attribute state in Tables 8.4 or coastal water objective in Table 8.1 for the relevant part – Freshwater Management Unit or coastal water management unit.</p> <p>Matters for discretion</p> <ol style="list-style-type: none"> 1. The contents and implementation of a stormwater management strategy prepared in accordance with Schedule 31 (stormwater strategy – whaitua) 2. The reduction of copper and zinc where required in order for the target attribute state or coastal water objective for these attributes to be met 3. Measures to achieve any other relevant target attribute states or coastal water objectives including for ecosystem health, nutrients, visual clarity and Escherichia coli or enterococci 4. Adverse effects, including cumulative and localised adverse effects, on: – <ol style="list-style-type: none"> (i) groundwater, surface water and coastal water, and particularly sites identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori customary use), and (ii) group drinking water supplies and community drinking water supplies – 5. Methodology to prioritise the reduction, removal, and/or treatment of stormwater discharges, including information requirements and engagement with mana whenua and the community
	Rule WH.R10: Stormwater from new state highways– discretionary activity.	Select stance	Part 1 Schedule 1		
	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces – discretionary activity.	Select stance	Part 1 Schedule 1		
	Rule WH.R12: All other stormwater discharges – non-complying activity.	Select stance	Part 1 Schedule 1		
	Rule WH.R13: Stormwater from new unplanned greenfield development – prohibited activity.	Select stance	Part 1 Schedule 1		
	8.3.3 Wastewater		Part 1 Schedule 1		

Rule WH.R14: Wastewater network catchment discharges – restricted discretionary activity.	Amend	Part 1 Schedule 1	Wellington Water is concerned that the Rule as drafted is extremely hard to satisfy, meaning that applications will become non-complying activities with avoid policies in place. Refer activity status points in Section A. For the same reason R93 should be added to the list of provision that will no longer apply to Whaitua Te Whanganui-a-Tara or Te Awarua-o-Porirua Whaitua. The matters of discretion need to avoid duplication with Schedule 32. We also consider that the matters of discretion are uncertain, 'in accordance with' is not a matter of fact. Nor can Wellington Water advise whether its strategy will definitively achieve the commensurate reductions There is duplication between clauses (1) and (2)-(9) and many of these clauses are unclear. Refer to Section A for additional context regarding prioritisation, target attribute states, modelling and monitoring.	Amend provision as follows: Rule WH.R14: Wastewater network catchment discharges – restricted discretionary activity The existing wastewater discharge from a wastewater network catchment including via a stormwater network to a surface water body or coastal water or onto or into land where it may enter water, is a restricted discretionary activity provided the resource consent application includes a strategy to progressively reduce and remove wastewater network catchment discharges in relation to the consent sought, in accordance with the requirements of Schedule 32 (wastewater strategy), including a strategy to progress towards reducing reduction of Escherichia coli or enterococci commensurate with what is required in the receiving environment to work towards achieving meet the target attribute state in Table 8.4 or coastal water objective in Table 8.1 for the relevant part Freshwater Management Unit or coastal water management unit. Matters for discretion 1. The contents and implementation of a wastewater network catchment improvement strategy prepared in accordance with Schedule 32 (wastewater strategy) 2. The reduction of dry weather discharges in order for the target attribute state for Escherichia coli and coastal water objectives for enterococci to be met, and/or the reduction of wet weather discharges in order for the containment standard to be met for the sub-catchment, as relevant to the consent sought 3. Measures to achieve reductions of wastewater network catchment discharges 4. Measures to achieve any other relevant target attribute states or coastal water objectives including for ecosystem health, nutrients, and visual clarity
Rule WH.R15: Existing wastewater discharges from a treatment plant – discretionary activity.	Amend	Part 1 Schedule 1	The condition limiting the load should be deleted as this will be very challenging to satisfy, particularly at Moa Point.	Removal of references to load.
Rule WH.R16: All other discharges of wastewater – non-complying activity.	Select stance	Part 1 Schedule 1		
8.3.4 Land uses		Freshwater		
Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	Select stance	Freshwater		
Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	Select stance	Freshwater		
Rule WH.R19: Vegetation clearance – discretionary activity.	Select stance	Freshwater		
Rule WH.R20: Plantation forestry – controlled activity.	Select stance	Freshwater		
Rule WH.R21: Plantation forestry – discretionary activity.	Select stance	Freshwater		
Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.	Select stance	Freshwater		
8.3.5 Earthworks		Both		
Rule WH.R23: Earthworks – permitted activity.	Amend	Freshwater	As discussed in relation to the earthworks definition, many earthworks activities undertaken by Wellington Water, with 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 the repair of a burst pipe may require resource consent as a restricted discretionary activity under Rule WH.R24. Given the number of burst pipes that WWL are required to fix, this proposed rule may mean that hundreds of resource consent applications would be required to be lodged with the GWRC per annum, for minor earthworks activities.	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.	Amend	Part 1 Schedule 1	Clause (b): Provide an exemption for Regionally Significant Infrastructure to reflect the volume of work that needs to be undertaken for RSI	Provide a exemption to (b) for RSI.
	Rule WH.R25: Earthworks – non-complying activity.	Select stance	Part 1 Schedule 1		
	8.3.6 Nutrients and sediment from pastoral farming		Freshwater		
	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares – permitted activity.	Select stance	Freshwater		
	Rule WH.R27: Farming activities on 20 hectares or more of land – permitted activity.	Select stance	Freshwater		
	Table 8.6: Phase-in of farm environment plans for part Freshwater Management Units.	Select stance	Freshwater		
	Rule WH.R28: Livestock access to a small river – permitted activity.	Select stance	Freshwater		
	Rule WH.R29: Livestock access to a small river – discretionary activity.	Select stance	Freshwater		
	Rule WH.R30: The use of land for farming activities – discretionary activity.	Select stance	Freshwater		
	Rule WH.R31: Change of rural land use – discretionary activity.	Select stance	Freshwater		
	Rule WH.R32: Farming activities – non-complying activity.	Select stance	Freshwater		
	8.3.7 Take and use of water		Freshwater		
	Rule WH.R33: Take and use of water in the Whaitua Te Whanganui-a Tara – restricted discretionary activity.	Select stance	Freshwater		
	Rule WH.R34: Take and use of water in the Whaitua Te Whanganui-a-Tara – discretionary activity.	Select stance	Freshwater		
	Rule WH.R35: Take and use of water from outstanding rivers or lakes – non-complying activity.	Select stance	Freshwater		
	Rule WH.R36: Take and use of water exceeding minimum flows or core allocation – prohibited activity.	Select stance	Freshwater		
	Table 8.7: Minimum flows for rivers in the Whaitua Te Whanganui-a-Tara.	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.	Select stance	Freshwater		
	Table 8.9: Groundwater allocation amounts for Category B groundwater and Category C groundwater in the Whaitua Te Whanganui-a-Tara.	Select stance	Freshwater		
	Figure 8.1: Te Awa Kairangi / Hutt River and Upper Hutt groundwater in Tables 8.8 and 8.9.	Select stance	Freshwater		
	Figure 8.2: Te Awa Kairangi / Hutt River and Lower Hutt groundwater in Tables 8.8 and 8.9.	Select stance	Freshwater		
Chapter 9 Te Awarua-o-Porirua Whaitua	9.1 Objectives		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.	Amend	Part 1 Schedule 1	Achieving wai ora by 2100 as previously circulated is a significant task. Removing almost one quarter of the timeframe is unrealistic. It is unclear what the status of the note is - would it be better placed in the definitions? As currently drafted it creates duplication, since (for example) the last two bullet points are replicated in P.O2.	Alter timeframe to 2123. Clarify the status of the note.
	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.	Amend	Freshwater	Refer overarching submission points in Section A. Wellington Water is concerned that the meaningful improvement may not be achieved by 2040, despite meaningful progress having been made. It is considered likely that the 2040 timeframe will result in the requirement for a large proportion of sub-catchments (or possibly all of them) required to be upgraded in the short term, rendering prioritisation upgrades meaningless.	Alter timeframe to 2060.
	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.	Oppose	Part 1 Schedule 1	In relation to the CWO contained in Table 9.1, these are considered generally appropriate parameters for coastal environmental health, however the lack of information relating to baseline states for Coastal Water Management Units and timeframes to meet the requirements makes it difficult to determine whether improvement can be measured. Its unclear how 'maintain or improve' operates for the objectives that don't have a value. Timeframe should refer to 2060 because many ecosystems or habitats will take a long time to recover and 2040 doesn't allow for that recovery time. It is also considered that 2040 timeframe will likely render prioritisation of sub-catchments for improvement or upgrade meaningless and 17 years is considered insufficient to achieve required outcomes. Please also refer to Section A regarding Target Attribute States, prioritisation and deliverability. It is considered that the wording 'meaningful progress' would be more appropriate.	Further detail is required in relation to the baseline states and required timeframes in both this objective and Table 8.1. Provide maps showing locations of high contaminant concentrations. Amend objective to provide this further detail. In addition to the above, amend as follows: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained, or meaningful progress has been made towards improvement or improved to achieve the coastal water objectives set out in Table 8.1, and by 2040 2060 . In clause (b) 'high contaminant concentrations' should be better defined Clauses (g) and (h): either combine or better distinguish
	Table 9.1: Coastal water objectives.	Oppose	Part 1 Schedule 1	Table 9.1 lacks the required information to set baseline states for the Coastal Water Management Units to assess whether the state is being maintained or improved. Table 9.1 also lacks timeframes for when the baseline will be determined. Refer also to Section A overarching submission points.	Alter timeframe to 2060. Further detail is required in relation to the baseline states and required timeframes. Wellington Water seeks that this table is withdrawn until such detail can be added.
	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.	Amend	Part 1 Schedule 1		
	Objective P.O5: Groundwater flows and levels, and water quality, are maintained.	Select stance	Freshwater		
	Objective P.O6: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Amend	Freshwater	Clause (a) needs to refer to 'meaningful progress' to reflect the reality of how long it will take to deliver improvements and for ecosystems to recover. Also see comments on prioritisation, Target Attribute State, and deliverability in Section A, and comments in relation to Table 9.2 below and previous comments on the parameters under submission points on Table 8.4. Clause (d): Huangā needs to refer to Schedule B to provide certainty for applicants.	Revise Clause (a) as follows: 'where a target attribute state in Table 9.2 is not met, the state of that attribute is improved in all rivers and river reaches in the part Freshwater Management Unit so that the target attribute state is met within the timeframe indicated within Table 9.2, or meaningful progress has been made, and ' Link Huangā with Schedule B.

	Table 9.2: Target attribute states for rivers.	Oppose	Freshwater	Refer to Section A overarching submission points. There is a general lack of information relating to the baseline state to measure against, meaning it is not possible to determine whether the TAS parameters and requirements are reasonable, appropriate and achievable. It is considered likely that the 2040 timeframe will result in the requirement for a large proportion of sub-catchments (or possibly all of them) to be upgraded in the short term, rendering prioritisation of sub-catchment upgrades meaningless. Refer also previous comments in relation to specific parameters under submission points on Table 8.4.	Further information is required on the baseline state, and a detailed assessment of the implications of the TAS provisions is required on a sub-catchment basis. Alter timeframe to 2060. PC1 should include guidance on how to measure the proportion from WWL's networks with inputs from other sources within the catchment. Wellington Water seeks that this table is withdrawn until such detail can be added.
	9.2 Policies		Both		
	9.2.1 Ecosystem health and water quality		Both		
	Policy P.P1: Improvement of aquatic ecosystem health.	Amend	Part 1 Schedule 1	Clause (a): Support the reference to 'progressively reducing the load' as reflecting the volume of work that needs to be achieved. Clause (c): replace 'enhancing' with 'maintaining or improving' as not all locations will require enhancement. Clause (d): define or use a more specific term for 'work programmes' to clarify that it does not relate to local authority networks.	Retain clause (a) Clause (b): replace 'enhancing' with 'maintaining or improving'. Clause (d): define or use a more specific term for 'work programmes' to clarify that it does not relate to local authority networks
	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	Part 1 Schedule 1	Refer to Section A overarching submission points. There is a general lack of information relating to the baseline state to measure against, meaning it is not possible to determine whether the TAS and CWO parameters and requirements are reasonable, appropriate and achievable. It is also unclear how the TAS, CWO and Freshwater Action Plans will impact upon sub-catchment prioritisation of improvements required for stormwater and wastewater discharges. How do 'non-regulatory methods' relate to 'work programmes' in P.P1(d)? Clause (b): is too vague. It needs to clearly state that redevelopment in existing urban areas will be encouraged as that provides opportunities to reduce the existing contaminant load, and that redevelopment—when it occurs—will be required to reduce the existing contaminant load. Clause (c): needs to make allowance for stormwater discharges that are not creating streambank erosion. Clause (d): should 'networks' be in bold as a defined term?	Wellington Water requests clarification from Greater Wellington regarding how the FAP provisions will work alongside existing TAS provisions, network discharge consent provisions, and in particular Schedules 31 and 32. Please provide clarity over relationship between 'non-regulatory methods' and 'work programmes'. The policy should then be amended to the extent necessary to appropriately reflect these interrelationships. In addition to the above, amend provisions as follows: (b) encouraging and where appropriate, requiring that redevelopment activities within existing urban areas to shall reduce the existing urban contaminant load, and (c) imposing hydrological controls on: (i) urban development and (ii) where appropriate and practicable, stormwater discharges to rivers in relation to streambank erosion
	Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Select stance	Freshwater		
	Policy P.P4: Contaminant load reductions.	Oppose	Part 1 Schedule 1	Refer to Section A overarching submission points. There is a general lack of information relating to the baseline state to measure against, meaning it is not possible to determine whether the CWO parameters and requirements are reasonable, appropriate and achievable. The timeframe of 2040 is too ambitious for the scale of work that needs to be carried out.	Change the timeframe to 2060. Further detail is required in relation to the baseline states and required timeframes. As such, Wellington Water seeks that this table is withdrawn until such detail can be added.
	Table 9.3: Harbour arm catchment contaminant load reductions.	Oppose	Part 1 Schedule 1	Refer to Section A overarching submission points. There is a general lack of information relating to the baseline state to measure against, meaning it is not possible to determine whether the CWO parameters and requirements are reasonable, appropriate and achievable. The timeframe of 2040 is too ambitious for the scale of work that needs to be carried out.	Change the timeframe to 2060. Further detail is required in relation to the baseline states and required timeframes. As such, Wellington Water seeks that this table is withdrawn until such detail can be added.

	Table 9.4: Part Freshwater Management Unit sediment load reductions required to achieve the visual clarity target attribute state.	Oppose	Part 1 Schedule 1	<p>Refer to Section A overarching submission points. A detailed assessment of the implications of the TAS provisions is required on a sub-catchment basis to determine appropriateness of the requirements and 2040 timeframes, and implications for sub-catchment prioritisation</p> <p>There is uncertainty regarding the modelled correlation between sediment loads and visual clarity and further assessment is needed.</p> <p>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.</p> <p>Furthermore, sediment loads, visual clarity and deposited sediment are influenced by factors within catchments outside of WWL's control. Human land uses and activities can significantly influence sediment loads within a catchment. Natural factors such as geology, slope and rainfall will influence the quantity of sediment within a catchment.</p>	<p>Refer to Section A overarching submission points.</p> <p>TAS for 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:</p> <ol style="list-style-type: none"> How sediment load reductions will be measured in the future How would proportionate contribution to sediment be measured and any reduction in this contribution be measured <p>Wellington Water seeks that this table is withdrawn until such detail can be added.</p>
	8.2.1 Discharges to water		Both		
	Policy P.P5: Localised adverse effects of point source discharges.	Select stance	Part 1 Schedule 1		
	Policy P.P6: Point source discharges.	Amend	Part 1 Schedule 1	The exclusion of stormwater and wastewater needs to be very explicit.	Amend policy as follows: For The cumulative adverse effects of point source discharges to water, excluding other than stormwater network and wastewater discharges, to water cumulative adverse effects are avoided and:
	Policy P.P7 Discharges to groundwater.	Select stance	Freshwater		
	Policy P.P8 Avoiding discharges of specific products and waste.	Select stance	Part 1 Schedule 1		
	9.2.2 Stormwater		Part 1 Schedule 1		
	Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Amend	Part 1 Schedule 1	<p>It is not possible to maintain baseline states if it is not clear what they are. The reference to table 9.1 should be deleted because it contains no relevant information.</p> <p>The policy could be interpreted as stormwater discharges being the only cause of heavy metal targets not being met, which is not correct.</p> <p>The timeframes in Table 9.2 should refer to 2060 rather than 2040.</p>	Amend policy as follows: Stormwater discharges to a surface water body or coastal water, or into or onto land in a manner that may enter freshwater or coastal water, are managed to support, in a commensurate manner, so that the baseline water quality state for copper and zinc is being maintained, or improved where degraded, including in the relevant part Freshwater Management Unit or coastal water management unit , in order for the coastal water objectives and target attribute states to be met by the timeframes set out in Tables 9.1 and 9.2.
	Policy P.P10: Managing adverse effects of stormwater discharges.	Select stance	Part 1 Schedule 1		
	Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises.	Support	Part 1 Schedule 1	Wellington Water supports this provision as achieving positive outcomes for water quality.	Retain provision

	Policy P.P12: Managing stormwater network discharges through a Stormwater Management Strategy.	Amend	Part 1 Schedule 1	<p>Clause (a): Support the focus on copper and zinc</p> <p>Clause (c): reference to concentrations needs to be deleted</p> <p>Clause (d): range of target attribute states is too wide and creates uncertainty for Wellington Water</p> <p>Clause (e) Wellington Water opposes the stormwater network modelling component of clause (e) as we will not model the network in its entirety ahead of starting work on the subcatchments. We also oppose the requirement in clause (e) to monitor concentrations in our discharge as concentrations are more relevant for receiving waters. Loads are appropriate for our discharges.</p> <p>Clause (f): The focus should be on modelling to determine the necessary copper and zinc load reduction in stormwater discharges. The reference to concentrations needs to be deleted and there is no point running a CLM model after implementation because it will provide the same information as pre-implementation.</p> <p>Clause (g): the plan sets many different priorities in different provisions making all the prioritisation meaningless. In addition, it is unclear how clauses (f) and (g) would interact. Wellington Water has proposed a replacement.</p> <p>The plan appears to use the different terms that mean the same thing, for example, in this policy: (i) 'Contribute to'</p>	<p>Amend policy as follows:</p> <p>Policy P.P12: Managing stormwater network discharges through a Stormwater Management Strategy Stormwater discharges from local authority and state highway networks shall be managed by:</p> <p>(a) reducing the copper and zinc loads in discharges to the coastal water management units of Onepoto Arm and Pāuatahanui Inlet in Map 82 and the harbour arm catchments in Map 84 by 15% for copper and 40% for zinc to contribute to meeting the target attribute states and coastal water objectives for copper and zinc in the Onepoto Arm and Pāuatahanui Inlet of Te Awarua-o-Porirua, and</p> <p>(b) reducing the copper and zinc loads in discharges to the Open Coast coastal water management units to contribute to meeting the coastal water objectives to maintain or improve, and</p> <p>(c) reducing the concentration and contaminant loads of copper and zinc from discharges to surface water bodies in order to maintain, and in degraded part Freshwater Management Units improve, the water quality state for dissolved copper and zinc to contribute to meeting the target attribute states in those part Freshwater Management Units, and</p> <p>(d) supporting the achievement of any other relevant target attribute states or coastal water objectives including for ecosystem health, nutrients, visual clarity and Escherichia coli or enterococci, and</p> <p>(e) implementing a stormwater management strategy and stormwater management plans prepared in accordance with the information and requirements set out in Schedule 31 (stormwater strategy—whaitua), and</p> <p>(f) monitoring and modelling the stormwater network to identify catchments to be prioritised</p>
	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Amend	Part 1 Schedule 1	Wellington Water supports the intent of this policy, but is not yet sure if a mean annual runoff target is the most appropriate measure. We query whether this should be mean rather than median, and also how easy this will be for developers or Wellington Water to assess compliance. It may be that ready made 'acceptable solutions' are easier to implement. As such Wellington Water reserves its position on the details of this policy.	Review this policy and in particular the reference to mean annual runoff, in order to ensure that the policy imposes targets that are readily measurable, able to be easily implemented, and clearly relate to the effects of runoff on the environment.
	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Select stance	Part 1 Schedule 1		
	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Select stance	Part 1 Schedule 1		
9.2.3 Wastewater			Both		
	Policy P.P16: General wastewater policy to achieve target attribute states and coastal water objectives.	Amend	Part 1 Schedule 1	Refer to Section A overarching submission points and comments in this submission on Tables 9.1 and 9.2. The policy could be interpreted as wastewater discharges being the only cause of e coli targets not being met,	Further information is required on the baseline state, and a detailed assessment of the implications of the TAS provisions is required on a sub-catchment basis. PC1 should include guidance on how to measure the proportion from WWL's networks with inputs from other
	Policy P.P17: Progressing works to meet Escherichia coli target attribute states.	Oppose	Freshwater	Purpose of policy is unclear and it should be deleted. It also implies that wastewater networks are the only source of e coli. Also refer to comments on prioritisation in Section A	Deletion of Policy

Policy P.P18: Managing wastewater network catchment discharges.	Amend	Part 1 Schedule 1	<p>Also refer to Section A overarching submission points on modelling and prioritisation. The policy should only relate to discharges within the public network. Discharges from privately owned wastewater pipes should not be included.</p> <p>Clauses (a), (c), (g) and (h): frequency is a more appropriate metric than volume for wastewater overflows in the network. References to volume should be deleted.</p> <p>Clause (a): It is unclear whether wet weather overflows are related to target attribute states and coastal water objectives. For example, policies WH.P19 and P.P18 direct that wet weather overflows are reduced to meet or exceed the containment standard. However other provisions (e.g Schedule 32) suggest that wet weather overflows are relevant to target attribute states and coastal water objectives. Wellington Water supports the focus on containment standard.</p> <p>Clause (b): please refer to Section A regarding prioritisation and how the plan renders it meaningless. It is not clear how this would work with clause (h). Wellington Water proposes another approach to prioritisation.</p> <p>Clause (c) the reference to 'potential' discharges is unclear and so should be deleted.</p> <p>Clause (e): should also mention kaitiaki monitoring.</p> <p>Clause (f): Wellington Water supports the intent of this clause, but is concerned it is not practicable.</p>	<p>Remove references to monitoring and modelling in this context. Amend provisions as follows:</p> <p>Policy P.P18: Managing wastewater network catchment discharges All wastewater network catchment discharges, including those which discharge via a stormwater network, shall be managed by:-</p> <p>(a) progressively reducing the frequency and/or volume of wet weather overflow — events to meet or exceed the containment standard of no more than 2 per year through the implementation of the methodologies set out in a Wastewater Network Catchment Improvement Strategy prepared in accordance with Schedule 32 (wastewater strategy), and</p> <p>(b) prioritising the removal of wet weather overflows in wastewater network sub-catchments where wet weather overflows are discharging to Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule H (contact recreation and Māori customary use) sites and mahinga kai, and</p> <p>(c) progressively reducing the frequency and/or volume of dry weather discharges or the potential for these discharges through the implementation of a Wastewater Network Catchment Improvement Strategy prepared in accordance with Schedule 32 (wastewater strategy) to contribute to meeting the target attribute states for Escherichia coli in Table 9.2 and the coastal water objectives for enterococci as set out in Table 9.1, and</p> <p>(d) implementing an inflow and infiltration programme to proactively upgrade the pipe</p> <p>Delete and replace with policy that:</p> <ul style="list-style-type: none"> • Recognises the benefits of WWTPs and their limited impacts on the environment • Recognises the differences between coastal and freshwater environments • Enables consideration of the benefits of dispersal, environmental effects and receiving environment rather than just treating all discharges the same • Maintains clause (c) and builds in kaitiaki monitoring, rather than relying on a note • Remove the requirement for mahinga kai monitoring in the zone of reasonable mixing
Policy P.P19: Managing existing wastewater treatment plant discharges.	Amend	Part 1 Schedule 1	<p>The policy will disincentivise long outfalls as there is no recognition of the benefits of pollution dispersal, the receiving environment (depth and turbulence) and ecology. Coastal environments are not subject to bottom lines and limits pursuant to the NPS-FM and therefore a more lenient approach can be applied. Currently, all our wastewater activities seem to be subject to improvement, regardless of whether the improvement is warranted or not. A more focused approach to Plan Change 1 would be beneficial. Wellington Water considers that its WWTP discharges to marine environments have limited impact on the environment and should be enabled.</p>	
9.2.4 Rural Land Uses and Earthworks		Both		
Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Select stance	Freshwater		
Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Select stance	Freshwater		
Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Select stance	Freshwater		
Policy P.P23: Phasing of farm environment plans.	Select stance	Freshwater		
Policy P.P24: Managing rural land use change.	Select stance	Freshwater		
Policy P.P25: Promoting stream shading.	Select stance	Freshwater		
Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Select stance	Freshwater		
Policy P.P27: Management of earthworks sites.	Select stance	Part 1 Schedule 1		
Policy P.P28: Discharge standard for earthworks sites.	Select stance	Part 1 Schedule 1		

	Policy P.P29: Winter shut down of earthworks.	Amend	Part 1 Schedule 1	This is excessive given the scale of work that needs to be delivered for Te Mana o te Wai (refer to deliverability in Section A). An exemption is required for Regionally Significant Infrastructure	Provide an exemption for Regionally Significant Infrastructure.
	9.2.5 Water allocation		Freshwater		
	Policy P.P30: Minimum flows and minimum water levels in Te Awarua-o-Porirua Whaitua.	Select stance	Freshwater		
	Policy P.P31: Water takes at minimum flows and minimum water levels.	Select stance	Freshwater		
	Policy P.P32: Allocation in the Te Awarua-o-Porirua Whaitua.	Select stance	Freshwater		
	9.3 Rules		Both		
	9.3.1 Discharges of contaminants		Both		
	Rule P.R1: Point source discharges of specific contaminants – prohibited activity.	Amend	Part 1 Schedule 1	Wellington Water fully supports the intent of this rule and associated policy. However, we are concerned about how it may impact on our stormwater and wastewater discharges and suggest an addition at the end of the rule	Add new clause to the end of the existing rule as follows: ... Noting that this rule does not apply to the discharge of contaminants collected as part of stormwater management as a result of precipitation or part of the operation of the wastewater network. <u>OR as alternative relief, define "point source discharge" so as to exclude discharges from the stormwater wastewater networks</u>
	Rule P.R2: Stormwater to land – permitted activity.	Select stance	Freshwater		
	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water – permitted activity.	Select stance	Part 1 Schedule 1		
	Rule P.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity.	Amend	Part 1 Schedule 1	Wellington Water is concerned that (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.	Amend Rule as follows: ... and where the discharge is not via an existing local authority stormwater network the discharge shall also not:-
	Rule P.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	Amend	Part 1 Schedule 1	Clause (c) is too vague as it does not specify what the hydrological controls have to achieve. Wellington Water seeks that compliance with a rainfall depth is required Wellington Water is concerned that (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.	Greater specificity in clause (c), including a requirement to retain a specific depth of rainfall. Delete the following clause: and where the discharge is not via an existing local authority stormwater network the discharge shall also not:-
	Rule P.R6: Stormwater from new greenfield impervious surfaces – controlled activity.	Amend	Part 1 Schedule 1	Is clause (e) missing a word after 'mean annual runoff' such as 'volume' or 'load'?	Consider if clause (e) requires an extra word.
	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas– controlled activity.	Select stance	Part 1 Schedule 1		

Rule P.R8: Stormwater from a local authority or state highway network–restricted discretionary activity.	Amend	Part 1 Schedule 1	<p>The requirement to progressively improve discharge quality may be excessive in some locations in relation to some or all target attribute states. Refer to comments within this submission in relation to Table 9.1 and 9.2 and overarching submission points in Section A.</p> <p>Wellington Water is concerned that the Rule as drafted is extremely hard to satisfy, meaning that applications will become non-complying activities with avoid policies in place. The activity conditions contain matters of uncertainty eg accordance with schedule 31. And its unclear how these conditions would work with the matters of discretion. A circular loop seems to be created. For the same reason R93 should be added to the list of provision that will no longer apply to Whaitua Te Whanganui-a-Tara or Te Awarua-o-Porirua Whaitua.</p> <p>Wellington Water supports the exclusion of discharges from high risk industrial or trade premises.</p> <p>Matter of discretion (3) refers to measures to achieve target attribute states and coastal water objectives. This needs to be altered to reflect that Wellington Water's stormwater network isn't the only source of contamination.</p> <p>Matter of discretion (5) duplicates information required by matter of discretion (1) and should be deleted.</p> <p>Matter of discretion (6) is too broad and needs to be reduced to scope so that: (a) Hydrological controls only relate to streambank erosion</p>	<p>Amend rule as follows:</p> <p>Rule P.R8: Stormwater from a local authority or state highway network – restricted discretionary activity</p> <p>The discharge of stormwater into water, or onto or into land where it may enter water, from a local authority or state highway stormwater network, including discharges via another stormwater network, except those from a high risk industrial or trade premise, is a restricted discretionary activity, provided the resource consent application includes a stormwater management strategy prepared in accordance with, Schedule 31 (stormwater strategy – whaitua) to progressively improve discharge quality, including a reduction of copper and zinc commensurate with what is required in the receiving environment to meet the target attribute state in Tables 9.2 or coastal water objective in Table 9.1 for the relevant part Freshwater Management Unit or coastal water management unit.</p> <p>Matters for discretion</p> <p>1. The contents and implementation of a stormwater management strategy prepared in accordance with Schedule 31 (stormwater strategy – whaitua)</p> <p>2. The reduction of copper and zinc where required in order for the target attribute state or coastal water objective for these attributes to be met</p> <p>3. Measures to achieve any other relevant target attribute states or coastal water objectives including for ecosystem health, nutrients, visual clarity and Escherichia coli or enterococci</p> <p>4. Adverse effects, including cumulative and localised adverse effects, on:</p> <p>(i) groundwater, surface water and coastal water, and particularly sites identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori customary use), and</p> <p>(ii) group drinking water supplies and community drinking water supplies</p> <p>5. Methodology to prioritise the reduction, removal, and/or treatment of stormwater discharges, including information requirements and engagement with mana whenua and the</p>
Rule P.R9: Stormwater from new state highways– discretionary activity.	Select stance	Part 1 Schedule 1		
Rule P.R10: Stormwater from new and redeveloped impervious surfaces– discretionary activity.	Select stance	Part 1 Schedule 1		
Rule P.R11: All other stormwater discharges – non-complying activity.	Select stance	Part 1 Schedule 1		
Rule P.R12 – Stormwater discharges from new unplanned greenfield development – prohibited activity.	Select stance	Part 1 Schedule 1		
9.3.3 Wastewater		Part 1 Schedule 1		

	Rule P.R13: Wastewater network catchment discharges to water – restricted discretionary activity.	Amend	Part 1 Schedule 1	<p>Wellington Water is concerned that the Rule as drafted is extremely hard to satisfy, meaning that applications will become non-complying activities with avoid policies in place. Refer discussion of activity status in Section A.</p> <p>For the same reason R93 should be added to the list of provision that will no longer apply to Whaitua Te Whanganui-a-Tara or Te Awarua-o-Porirua Whaitua.</p> <p>The matters of discretion need to avoid duplication with Schedule 32.</p> <p>We also consider that the matters of discretion are uncertain, 'in accordance with' is not a matter of fact. Nor can Wellington Water advise whether its strategy will definitively achieve the commensurate reductions</p> <p>There is duplication between clauses (1) and (2)-(9) and many of these clauses are unclear.</p> <p>Refer to Section A for additional context regarding prioritisation, target attribute states, modelling and monitoring.</p>	<p>Amend rule as follows:</p> <p>Rule P.R13: Wastewater network catchment discharges to water – restricted discretionary activity</p> <p>The existing wastewater discharge from a wastewater network catchment, including via a stormwater network, to a surface water body or coastal water or onto or into land where it may enter water, is a restricted discretionary activity provided the resource consent application includes:</p> <p>(a) a strategy to progressively reduce and remove wastewater network catchment discharges in relation to the consent sought, in accordance with the requirements of Schedule 32 (wastewater strategy), and</p> <p>(b) the reduction of Escherichia coli or enterococci proposed in the strategy is commensurate with what is required in the receiving environment to meet the target attribute state in Table 9.2 or coastal water objective in Table 9.1 for the relevant part Freshwater Management Unit or coastal water management unit.</p> <p>Matters for discretion-</p> <ol style="list-style-type: none"> 1. The contents and implementation of a wastewater network catchment improvement strategy prepared in accordance with Schedule 32 (wastewater strategy)- 2. The reduction of dry weather discharges in order for the target attribute state for Escherichia coli and coastal water objectives for enterococci to be met, and/or the reduction of wet weather discharges in order for the containment standard to be met for the sub-catchment, as relevant to the consent sought- 3. Measures to achieve reductions of wastewater network catchment discharges 4. Measures to achieve any other relevant target attribute states or coastal water
	Rule P.R14: Existing wastewater discharges from a treatment plant to coastal and freshwater – discretionary activity.	Amend	Part 1 Schedule 1	The condition limiting the load should be deleted as this will be very challenging to satisfy.	Removal of references to load.
	Rule P.R15: All other discharges of wastewater – non-complying activity.	Select stance	Part 1 Schedule 1		
	9.3.4 Land uses		Freshwater		
	Rule P.R16: Vegetation clearance on highest erosion risk land– permitted activity.	Select stance	Freshwater		
	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.	Select stance	Freshwater		
	Rule P.R18: Vegetation clearance – discretionary activity.	Select stance	Freshwater		
	Rule P.R19: Plantation forestry – controlled activity.	Select stance	Freshwater		
	Rule P.R20: Plantation forestry – discretionary activity.	Select stance	Freshwater		
	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.	Select stance	Freshwater		
	9.3.5 Earthworks		Both		
	Rule P.R22: Earthworks – permitted activity.	Amend	Freshwater	<p>As discussed in relation to the earthworks definition, many earthworks activities undertaken by Wellington Water, with 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.</p> <p>Activities such as the repair of a burst pipe may require resource consent as a restricted discretionary activity under Rule P.R22. Given the number of burst pipes that WWL are required to fix, this proposed rule may mean that hundreds of resource consent applications would be required to be lodged with the GWRC per annum, for minor earthworks activities.</p>	Amend Rule P.R22, (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 P.R23: Earthworks – restricted discretionary activity.	Amend	Part 1 Schedule 1	Clause (b): Provide an exemption for Regionally Significant Infrastructure to reflect the volume of work that needs to be undertaken for RSI	Provide an exemption to (b) for RSI.
	Rule P.R24: Earthworks – non-complying activity.	Select stance	Part 1 Schedule 1		
	9.3.6 Nutrients and sediment from pastoral farming		Freshwater		
	Rule P.R25: Farming activities on properties of between 4 hectares and 20 hectares – permitted activity.	Select stance	Freshwater		
	Rule P.R26: Farming activities on 20 hectares or more of land – permitted activity.	Select stance	Freshwater		
	Table 9.5: Phase in of farm environment plans for Part Freshwater Management Units.	Select stance	Freshwater		
	Rule P.R27: The use of land for farming activities – discretionary activity.	Select stance	Freshwater		
	Rule P.R28: Change of rural land use – discretionary activity.	Select stance	Freshwater		
	Rule P.R29: Farming activities – non-complying activity.	Select stance	Freshwater		
	9.3.7 Take and use of water		Freshwater		
	Rule P.R30: Take and use of water – permitted activity.	Select stance	Freshwater		
	Rule P.R31: Take and use of water – restricted discretionary activity.	Select stance	Freshwater		
	Rule P.R32: Take and use of water – discretionary activity.	Select stance	Freshwater		
	Rule P.R33: Taking and use of water that exceeds minimum flows or allocation amounts – prohibited activity.	Select stance	Freshwater		
	Table 9.6: Minimum flows for Te Awarua-o-Porirua Whaitua.	Select stance	Freshwater		
	Table 9.7: Surface water allocation amounts for Te Awarua-o-Porirua Whaitua.	Select stance	Freshwater		
	12 Schedules		Both		
	Schedule A: Outstanding water bodies	Select stance	Part 1 Schedule 1		
	Schedule A2: Lakes with outstanding indigenous ecosystem values.	Select stance	Part 1 Schedule 1		
	Schedule F: Ecosystems and habitats with significant indigenous biodiversity values.	Select stance	Part 1 Schedule 1		
	Schedule F1: Rivers and lakes with significant indigenous ecosystems.	Select stance	Part 1 Schedule 1		
	Schedule F2a: Significant habitats for indigenous birds in rivers.	Select stance	Part 1 Schedule 1		
	Schedule F2b: Significant habitats for indigenous birds in lakes.	Select stance	Part 1 Schedule 1		
	Schedule F2c: Significant habitats for indigenous birds in the coastal marine area.	Select stance	Part 1 Schedule 1		
	Schedule F4: Sites with significant indigenous biodiversity values in the coastal marine area.	Select stance	Part 1 Schedule 1		
	Schedule F5: Habitats with significant indigenous biodiversity values in the coastal marine area.	Select stance	Part 1 Schedule 1		

	Schedule 27: Freshwater Action Plan requirements.	Amend	Part 1 Schedule 1	We would like to confirm that actions in the Freshwater Action Plans will not be additional to the requirements of Schedules 31 and 32 for operation of the wastewater and stormwater networks. As drafted, these provisions are unclear as to how these align with other strategies/plans and how they will work with other regulatory provisions. The current provisions for FAPs, could be read to have some level of influence in relation to wastewater and stormwater network discharge consents and prioritisation of sub-catchments. It is not clear how the proportion of pollution reduction from the Freshwater Action Plans will be calculated, so that other parties can calculate the commensurate reduction from their activities. Also refer to our overarching submission points in Section A.	Amend to clarify how the FAP provisions will work alongside TAS provisions, network discharge consent provisions, and in particular Schedules 31 and 32. Also amend to clarify what is intended for the level of consideration or influence that any FAP could have on wastewater and stormwater network discharge consents.
	A2 Freshwater Action Plans required in Whaitua Te Whanganui-a-Tara.	Select stance	Freshwater		
	A3 Freshwater Action Plans required in Te Awarua-o-Porirua Whaitua.	Select stance	Freshwater		
	B Freshwater Action Plan requirements.	Select stance	Freshwater		
	B1. Principles.	Select stance	Freshwater		
	B2. General Content.	Select stance	Freshwater		
	B3 Necessary actions.	Select stance	Freshwater		
	C. Freshwater Action Plans in Whaitua Te Whanganui-a-Tara	Select stance	Freshwater		
	D Freshwater Action Plans in Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
	Schedule 28: Stormwater Contaminant Treatment.	Select stance	Part 1 Schedule 1		
	Table 1: Target load Reductions for Copper and Zinc	Select stance	Part 1 Schedule 1		
	Table 2: Additional Devices and Specified Load Reductions for Copper and Zinc	Select stance	Part 1 Schedule 1		
	Schedule 29: Stormwater Impact Assessments.	Select stance	Part 1 Schedule 1		
	Schedule 30: Financial Contributions.	Select stance	Part 1 Schedule 1		
	A Context	Select stance	Part 1 Schedule 1		
	B Purpose	Select stance	Part 1 Schedule 1		
	C Definition of an Equivalent Household Unit	Select stance	Part 1 Schedule 1		
	D Calculation of level of contribution	Select stance	Part 1 Schedule 1		
	Table D1. Financial contribution calculations for residential greenfield development	Select stance	Part 1 Schedule 1		
	Tale D2. Financial contribution calculations for non-residential greenfield development and new roads/state highways	Select stance	Part 1 Schedule 1		
	E Use	Select stance	Part 1 Schedule 1		
	Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Part 1 Schedule 1	In general the wording and contents of the schedule may have implications for prioritisation methodologies and implementation and have been addressed in our overarching submission points in Section A (see also the summary of relief sought in relation to Schedules 31 and 32)	Amend to address the submission points outlined in Section A of Wellington Water's submission regarding prioritisation methodologies and implementation.
	Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Oppose	Part 1 Schedule 1	Clause 1: - The reference to "in accordance with relevant objectives and policies of the Plan" does not serve a clear purpose, since schedules should be considered in the context of the overall Plan by default. The requirement in Clause 1 to manage stormwater 'in accordance with' the objectives and policies of the Plan invites second guessing and the exercise of subjective judgement from decision-makers (or submitters), which is not appropriate in a Schedule and could affect an application's activity status. Wellington Water seeks that this clause is reframed as an information requirement to describe how the strategy responds to the relevant objectives and policies in the Plan.	Clause 1 - This should be reframed as an information requirement., e.g., "describes how it responds to the relevant objectives and policies in the plan".

Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Part 1 Schedule 1	Clause 2: groundwater While Wellington Water is not opposed to the reference to groundwater in clause 2, there is a need to clarify the references to and requirements in relation to groundwater throughout PC1. Also refer to Wellington Water's overarching submission point on Groundwater in Section A.	Clarify the references to and requirements in relation to groundwater throughout PC1.
Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Part 1 Schedule 1	Clause 3: - We do not think that there is sufficient information to model first flush discharges. In addition, the clause needs to be rewritten so that this action is not responsible for achieving TAS.	Address the lack of information regarding first flush discharges and rewrite end of clause as follows: '... will be reduced in order for to support the target attribute state...
Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend		Clause 4: We oppose the use of the term "concentration" as it is difficult to identify and establish what this means in real terms. Wellington Water opposes the reference to contaminant concentrations in clause 4 (and elsewhere throughout PC1). Concentrations are influenced by receiving water flows, currents, deposition and upstream catchments. The "concentration" in the discharge effectively is meaningless as it is immediately diluted as it enters the receiving water. Identifying contaminant load in the discharge is more appropriate as it can be	Amend Clause 4 as follows: identifies the contaminant load and concentrations for copper and zinc arising from the applicable local authority or state highway stormwater network discharges using modelling and monitoring, and
Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Part 1 Schedule 1	Clause 5: It is our opinion that stormwater should be considered as part of the context of the wider environment. We can reduce loading, but we cannot model how reduction will result in achieving the TAS without a larger, regional-scale model. There is no common link across different catchments that can be used to correlate loading and TAS. The wording of "commensurate" should be amended to improve clarity. ☒ The requirement to identify 'commensurate reductions' in clause 5 <u>is opposed</u> for a number of reasons discussed in Section A of our submission. Accordingly, alternative wording is sought, as well as acknowledgement that the details may not be able to be confirmed until the SCaMP (SMP)	Amend Clause 5 as follows: identifies describes the approach to determining (through Stormwater Management Plans) the reduction of copper and zinc to be achieved needed in the stormwater network discharge that is commensurate with that required in the receiving environment to meet in order to contribute to meeting the target attribute state or coastal objective for the part Freshwater Management Unit or coastal water management unit in the receiving environment , and
Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Part 1 Schedule 1	Clause 7: We query the use of the term "avoid". Avoiding the adverse effects of stormwater would include issues out of the control of Wellington Water, for example, flooding on properties. We do not think it is achievable for Wellington Water to actively maintain or re-establish natural flow regimes, with a similar rationale to above; that there are too many factors outside our control for stormwater management.	Amend Clause 7 as follows: describes actions to maintain or re-establish natural flow regimes to avoid, to the extent practicable, including the use of hydrological controls to avoid adverse effects of stormwater quantity (flows and volumes) and maintain, to the extent practicable, natural stream flows, and
Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Part 1 Schedule 1	Clause 8: We consider that it is more appropriate to identify the content of Cl8 in Sub-catchment Management Plans (SCaMPs) rather than the Stormwater Management Strategy itself. Either delete, or clarify this clause refers to methodology rather than outcomes.	Delete Clause 8, or amend as follows: identifies locations and opportunities for the retention or detention of stormwater flows or volumes, and how these will be implemented via the SMPs and
Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Part 1 Schedule 1	Clause 9: Community engagement is too onerous and should not be a requirement.	Delete reference to 'community' from clause 9.
Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Oppose	Part 1 Schedule 1	(a)(vi): We question why this includes HAIL and is not limited to "industrial and trade premises". HAIL is broader regarding the activities it covers. It includes agricultural products, which might not require an industrial permit. And given that industrial and trade premises will require their own approvals this should not be a matter for schedule 31	Delete clause. In the alternative, if clauses (a)(vi) to (ix) are not deleted in their entirety, then they should be moved to the Stormwater Management Plan requirements at the end of Schedule 31.
Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Oppose	Part 1 Schedule 1	(a)(vii): this information request is overly onerous	Delete this clause. In the alternative, if clauses (a)(vi) to (ix) are not deleted in their entirety, then they should be moved to the Stormwater Management Plan requirements at the end of Schedule 31.
Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Oppose	Part 1 Schedule 1	(a)(viii): this information would be needed for concentrations. Wellington Water will only be modelling and managing "loads" not concentrations. In addition, it is overly onerous	Delete this clause. In the alternative, if clauses (a)(vi) to (ix) are not deleted in their entirety, then they should be moved to the Stormwater Management Plan requirements at the end of Schedule 31.
Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Oppose	Part 1 Schedule 1	(a)(ix): this clause is overly onerous	Delete this clause. In the alternative, if clauses (a)(vi) to (ix) are not deleted in their entirety, then they should be moved to the Stormwater Management Plan requirements at the end of Schedule 31.

Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Part 1 Schedule 1	Strategic actions: Wellington Water supports Schedule 31 not requiring the prioritisation of sub-catchments to be completed in the SMS. However, as noted in the overarching submission points, the plan does not provide a sensible approach to the prioritisation. This should be rectified by use of policy and the schedule, including a list of matters to be considered.	Amend provision as follows: (b) set out the methodology, including information requirements and engagement with mana whenua and the community, to support the decision-making to be used to prioritise all catchments or sub-catchments for implementation actions and mitigation measures specified in the SMS to maintain, or improve where degraded, the receiving water quality, as well as the relevant matters to be considered, which shall include but not be limited to (in no particular order): Schedule A (outstanding water bodies) Schedule C (mana whenua) Schedule F (sites of significance) Schedule H (contact recreation and Maori customary use) Primary contact sites in Map 85 impacts on group drinking water supplies or community drinking water supplies efficiency and alignment with other work programmes including Wastewater Network Improvement Strategy or Sub-catchment Improvement Plan; investment availability public health effects modelling results
Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.		Part 1 Schedule 1		
Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Part 1 Schedule 1	Management options (d): clarification should be provided as to whether this includes both public and private treatment in relation to ‘communal stormwater’. The detail of this should be provided at SMP stage.	Amend to clarify and address the split between SMS and SMP.
Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Part 1 Schedule 1	Management options (e): clarify whether this is offsetting or a clawback	Amend to clarify.
Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Oppose	Part 1 Schedule 1	Management options (f): this should be in the SCaMPs as it is too specific for the SMS.	Delete clause (f).
Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Part 1 Schedule 1	Management options (g): Amend to reflect extent of Wellington Water’s control by referring to cross connections in the public network	Amend clause (g) as follows: Describe the programme to investigate and reduce the number of illegal public network cross-connections, and
Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Part 1 Schedule 1	Management options (h): suggest alternative wording of “to support achieving the outcomes” instead of “to support the modelling” as there is no guarantee the model would use these types of inputs. Moreover, this needs to be addressed only at the high level in the SMS, with detail for the SMPs.	Amend management options (h) as follows: broadly describe the mātauranga monitoring, receiving environment monitoring , and monitoring to be undertaken to support the modelling outcomes (if any), noting that it may be more appropriate for matters of detail to be confirmed in the Stormwater Management Plans, and
Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Oppose	Part 1 Schedule 1	Localised effects (j): too specific for the SMS stage, more appropriate to be addressed in the SCaMPs.	Delete clause (j).

	Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Part 1 Schedule 1	<p>Stormwater management plans: Support the general approach towards stormwater management plans, particularly that they can be developed and implemented over time. Chapeau needs to be rewritten so it is clear that Wellington Water's actions will contribute to the solution, not be the solution.</p> <p>Also, the reference should be to 'sub-catchment', not 'catchment'.</p>	<p>Amend Stormwater Management Plans chapeau as follows: Stormwater Management Plans for each stormwater sub-catchment shall provide details of the actions and locations of stormwater treatment systems to be implemented. These plans are intended to be prepared and implemented over time for each of the stormwater catchments or sub-catchments, or smaller geographical areas if deemed appropriate. Stormwater Management Plans shall be produced based on the prioritisation of sub-catchments or areas set out in the Stormwater Management Strategy and will set out how stormwater discharges in that area will be managed in order for to support meeting the target attribute states and coastal water objectives for copper and zinc to be met.</p>
	Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Part 1 Schedule 1	<p>Review of Stormwater Management Strategy (SMS): Further clarity would be helpful with respect to what information is required to be included in the first iteration of the SMS on the actions needed to meet TAS and CWO (coastal water objectives).</p> <p>Refine wording so that Wellington Water's actions are not required to meet the TAS but to contribute to meeting them.</p> <p>Alter reference to modelling and monitoring to reflect roles of Wellington Water and GW.</p>	<p>Provide clarification regarding information requirements for TAS and CWO.</p> <p>Amend chapeau as follows: Stormwater Management Strategies will be adaptive and updated as catchment characteristics, monitoring data, and information changes, and new technology becomes available. A Stormwater Management Strategy must be reviewed and certified by Wellington Regional Council on a regular basis and at least once every 10 years. The actions needed to contribute to meet the target attribute states and coastal water objectives will be defined as far as practicable in the first iteration of the strategy and should be refined through regular reviews. The reviews shall be guided by modelling and monitoring undertaken by the consent holder regarding contaminant loads and modelling undertaken by Greater Wellington in relation to receiving environments and monitoring undertaken by the consent holder, and monitoring undertaken by the Wellington Regional Council in accordance with the National Policy Statement for Freshwater Management 2020.</p>
0	Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	Amend	Part 1 Schedule 1	<p>New clause is needed to clarify the role of the SMS in relation to various policies in the plan.</p>	<p>Add a new clause as follows: Note: to avoid doubt, a Stormwater Management Strategy prepared in accordance with this Schedule is not required to address the matters in:</p> <p>Policy WH.P5 : Localised adverse effects of point source discharge;</p> <p>Policy WH.P6: Cumulative adverse effects of point source discharges;</p> <p>Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises</p> <p>Policy WH.P12: Managing stormwater from a port or airport;</p> <p>Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces;</p> <p>Policy WH.P15: Stormwater contaminant offsetting for new greenfield development;</p> <p>Policy WH.P16: Stormwater discharges from new unplanned greenfield development;</p> <p>Policy P.P5: Localised adverse effects of point source discharges;</p> <p>Policy P.P6: Point source discharges;</p> <p>Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises;</p> <p>Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces;</p>
	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Part 1 Schedule 1	<p>In general, the wording and contents of the schedule may have implications for prioritisation methodologies and implementation and have been addressed in our overarching submission points in Section A. Other relevant overarching submission points are: Schedule 32, target attribute states, monitoring, modelling, objectives, policies and rules.</p>	<p>Amend to address matters raised in Section A of Wellington Water's submission regarding prioritisation methodologies and implementation.</p>
	Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Part 1 Schedule 1	<p>Rule WH.R14 requires this strategy to be included with the application, so doesn't leave the same room for details to be filled in later (after consent granted). The level of detail required is difficult to achieve given that this needs to be lodged with the consent application.</p> <p>The reference to WH.R15 should be replaced by WH.R14</p>	<p>Reduce the level of detail required for the strategy and instead require it in the subcatchment reduction plans.</p> <p>Refer to WH.R14 and P.R13 rather than WH.R15 and P.R14.</p>

Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Part 1 Schedule 1	Clause 1 is too broad and will be impossible to satisfy. The policies make it clear that the focus for wet weather overflows is the containment standard, for which clause 2 is sufficient. Clause 1 can be repurposed to focus on dry weather discharges.	Amend clause 1 as follows: manages the wastewater network catchment in accordance with the relevant objectives and policies of the Plan, provides a strategic and integrated management plan for reducing the frequency of dry weather discharges, and
Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Part 1 Schedule 2	Clause 2 should refer to wet weather overflows meeting the containment standard, not all wastewater overflows (which includes dry weather).	Limit to wet weather overflows.
Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Part 1 Schedule 1	Clause 3: rewrite to make it clear that management of the wastewater network is a contributing factor to the TAS rather than the only factor. Add in another cause of <i>e. coli</i> : <i>blockages within the network</i>	Amend clause 3 as follows: provides a strategy for how to progress towards achieving target attribute states for <i>Escherichia coli</i> and coastal objectives for enterococci will be achieved , including through reducing inflow, infiltration (groundwater into wastewater pipes), blockages and exfiltration (wastewater leakage), and
Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Part 1 Schedule 1	Clause 4: Consider adding something on the relevance of policy directions in the NRP. Does not sit easily with WH.P19(b) which outlines what has to be prioritised. Replace 'number and volume' with 'frequency' as this is more technically appropriate. Delete reference to the community as Wellington Water is resolving this in other ways.	Amend clause 4 as follows: identifies the methodology, with reference to the prioritisation matters contained in Policy WH.P19(b) and Policy P.P18(b) , including engagement with mana whenua and the community, to prioritise wastewater network sub-catchments and/or waterbodies for implementation actions and/or mitigation measures in order to reduce the frequency number and volume of wet weather overflows and dry weather discharges, to improve water quality, and
Schedule 32: Wastewater Network Catchment Improvement Strategy.	Oppose	Part 1 Schedule 1	Clause 5: requires a programme for increasing repairs and renewals, which is too onerous on top of other work programmes and risks placing the focus in the wrong work area.	Delete clause 5.
Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Part 1 Schedule 1	Clause 6: should refer to overflows rather than failures	Amend clause 6 as follows: reduces pipe failures overflows as a result of blockages within the network or due to aging infrastructure, and
Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Part 1 Schedule 1	Clause 7: The reduced role of Wellington Water for nutrients needs to be reflected in the wording of this clause.	Amend clause 7 as follows: describes how it will support working towards achieving the target attribute states for nitrate, ammonia, phosphorus, dissolved inorganic nitrogen (DIN) and dissolved reactive phosphorus (DRP), and
Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Part 1 Schedule 1	In the Wastewater Network Catchment management objective (a), the reference to managing in accordance with the objectives would invite judgment. Wellington Water considers this requirement in the schedule should be reframed as an information requirement	Amend wastewater network objective (a) as follows: identify the relevant water quality objectives, target attribute states, and coastal objectives in this Plan that the wastewater network catchment strategy will respond to is to be managed in accordance with,
Schedule 32: Wastewater Network Catchment Improvement Strategy.	Oppose	Part 1 Schedule 1	Wastewater Network Catchment management objective (b) is too onerous given the highly variable nature of wastewater discharges and will provide very little, if any, benefit	Delete clause (b).
Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Part 1 Schedule 1	Wastewater Network Catchment management objective (c) requires confirmation of the meaning of 'commensurate' in this context. Also refer to Wellington Water's comments on this term in Section A of our submission.	Amend wastewater network objective (c) as follows: describe the approach to determining (through sub-catchment improvement plans) identify the strategy to progress towards reduction reducing in the reductions in <i>Escherichia coli</i> to be achieved in order to contribute to needed commensurate with that required in the receiving environment to meet meeting the target attribute state for <i>Escherichia coli</i> for the affected part Freshwater Management Unit in the receiving environment , and
Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Part 1 Schedule 1	Wastewater Network Catchment management objective (d): While Wellington Water is supportive of the intention for individual sub-catchments to be able to set more or less ambitious containment standards; this should be decided after consent has been granted though the sub-catchment improvement plans. However, Wellington Water suggests that this clause could usefully provide guidance in terms of how the containment standard(s) are to be set, and seeks wording consistent with the approach that has been taken in its applications to date.	Amend clause (d) as follows: (d) identify the methodology for determining (in sub-catchment improvement plans) the current and target containment standard for each wastewater network sub-catchment for each waterbody or sub-catchment, based on data from a network model, which may include consideration of: network performance, the high level costs and feasibility of achieving different containment standards, and the effects on the environment of the network performing in accordance with different containment standards (including contribution to achieving target attribute states) , and
Schedule 32: Wastewater Network Catchment Improvement Strategy.	Select stance	Part 1 Schedule 1		
Schedule 32: Wastewater Network Catchment Improvement Strategy.	Select stance	Part 1 Schedule 1		
Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Part 1 Schedule 1	Receiving water body catchment characteristics (g)(iii): delete 'annual mean overflow volume' and 'number' as these are not the key variables. Frequency is the key variable.	Amend (g)(iii) as follows: the annual mean overflow volume, the number and/or frequency of wet weather overflows to a wastewater network sub-catchment or waterbody, and
Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Part 1 Schedule 1	Strategic actions (i): 'the number of' should be changed to 'frequency' which is a more appropriate metric	Amend strategic actions clause (i) as follows: Describe the actions to be taken to reduce the number frequency of wet weather overflows through time to meet the objectives of the Plan and the containment standard , and

Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Part 1 Schedule 1	Strategic actions (j): Clause needs to reflect that Wellington Water's dry weather discharges are not the only source of E coli.	Amend strategic actions clause (j) as follows: Describe the actions responsive management approach to be taken applied to reduce dry weather discharges through time, in order for to support the target attribute states for <i>Escherichia coli</i> and coastal objectives for enterococci to be being met , and
Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Part 1 Schedule 1	Strategic actions (k): the reference to receiving environment monitoring should be deleted as this will not be undertaken by the applicant.	Amend strategic actions clause (k) as follows: Describe the mātauranga monitoring, receiving environment monitoring , frequency of wet weather overflows monitoring, and monitoring to be undertaken to support the modelling, and
Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Part 1 Schedule 1	Strategic actions (m): Referencing any activity as illegal is unusual in an RMA document and it is unnecessary so should be deleted. Listing locations is prioritisation and is unhelpful given the scale of work that needs to be completed, the potential lack of alignment between these locations and Wellington Water's other activities and the lack of connectivity between these locations and other priorities in the Plan. Refer to Section A pf Wellington Water's submission for more detail.	Amend strategic actions clause (m) as follows: Describe the programme to investigate and reduce the number of illegal cross-connections in the public network , and in Whaitua Te Whanganui a Tara , prioritise audits for Kaiwharawhara Stream, Korokoro Stream, Wainuiomata River and Black Creek , and
Schedule 32: Wastewater Network Catchment Improvement Strategy.	Oppose	Part 1 Schedule 1	Reporting of the Wastewater Network Catchment Improvement Strategy (s): delete as this is a Greater Wellington responsibility and impossible for the applicant to implement without a Freshwater Management Tool	Delete clause (s).
Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Part 1 Schedule 1	Subcatchment Improvement Plans: Support the general approach towards subcatchment improvement plans, particularly that they can be developed and implemented over time. The dry weather discharges need to be managed so that they are reduced to contribute to meeting the standards, rather than being responsible for meeting the standards. Schedule 32 should provide for dry weather discharges to be managed via a 'responsive management approach'. An altered chapeau paragraph structure would make it easier to read and we have provided an option.	Amend Subcatchment Improvement Plans chapeau as follows: Sub-catchment Improvement Plans shall be prepared and implemented for each of the sub-catchments that make up the wastewater network catchment, or smaller geographical areas. They will be produced over time based on the prioritisation of sub-catchments and will set out how the frequency of: (i) wet weather overflows will be reduced in sub-catchments or areas to meet the containment standard and/or (ii) dry weather discharges will be reduced in accordance with a responsive management approach reduced in order for the target attribute states or coastal objectives to be met
Schedule 32: Wastewater Network Catchment Improvement Strategy.	Amend	Part 1 Schedule 1	Review of the Wastewater Network Catchment Improvement Strategy: is the maximum review timeframe of once every ten years correct, or is it intended to be a minimum? Should refer to actions to 'support' rather than actions to 'meet' the TAS. The reviews should also be able to build on environmental water quality modelling undertaken by GW.	Amend the Wastewater Networks Catchment Improvement Strategy chapeau as follows: The intention of the Wastewater Network Catchment Improvement Strategy is that it will be adaptive as updated catchment characteristics, monitoring data, and information and technology become available. The strategy shall be reviewed and certified by Greater Wellington on a regular basis and no more than once every 10 years. The actions needed to meet support the target attribute states will be defined as far as practicable in the first iteration of the strategy and refined through regular reviews. The reviews will be guided by the modelling and monitoring undertaken by the consent holder, and monitoring and modelling undertaken by the Wellington Regional Council in accordance with the National Policy Statement for Freshwater Management 2020.
Schedule 32: Wastewater Network Catchment Improvement Strategy.	Select stance	Part 1 Schedule 1		
Schedule 32: Wastewater Network Catchment Improvement Strategy.	Select stance	Part 1 Schedule 1		
C1 Contents of the Erosion and Sediment Management Plan	Select stance	Freshwater		
D Amendment of Erosion and Sediment Management Plan	Select stance	Freshwater		
Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	Select stance	Freshwater		
A Purpose of the Erosion and Sediment Management Plan	Select stance	Freshwater		
B Management objectives	Select stance	Freshwater		
C Requirements of the Erosion and Sediment Management Plan	Select stance	Freshwater		

	C1 Contents of the Erosion and Sediment Management Plan	Select stance	Freshwater		
	C2 Certification of the Erosion and Sediment Management Plan	Select stance	Freshwater		
	D Amendment of Erosion and Sediment Management Plan	Select stance	Freshwater		
	Schedule 35: Small farm registration.	Select stance	Freshwater		
	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Select stance	Freshwater		
	A Certification requirements under the Resource Management (Freshwater Farm Plans) Regulations 2023.	Select stance	Freshwater		
	B Management objectives.	Select stance	Freshwater		
	C Content of a farm environment plan.	Select stance	Freshwater		
	D Risk assessment and mitigation to address risk.	Select stance	Freshwater		
	Table D1 Sediment loss and transport risk factors	Select stance	Freshwater		
	E Erosion Risk Treatment Plan.	Select stance	Freshwater		
	F Small stream riparian programme.	Select stance	Freshwater		
13 Maps			Both		
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4).	Select stance	Part 1 Schedule 1		
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 1: (Kāpiti).	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).	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.	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).	Select stance	Part 1 Schedule 1		
	Map 78: Part freshwater management units and target attribute state sites (rivers) – Te Awarua-o-Porirua.	Select stance	Freshwater		
	Map 79: Part freshwater management units and target attribute state sites (rivers) – Te Whanganui-a-Tara.	Select stance	Freshwater		
	Map 80: Part freshwater management units and target attribute state sites (lakes) – Te Whanganui-a-Tara.	Select stance	Freshwater		
	Map 81: Rivers and catchment management units for water takes – Te Awarua-o-Porirua.	Select stance	Freshwater		
	Map 82: Coastal water management units – Te Awarua-o-Porirua.	Select stance	Part 1 Schedule 1		
	Map 83: Coastal water management units – Te Whanganui-a-Tara.	Select stance	Part 1 Schedule 1		
	Map 84: Harbour arm catchments – Te Awarua-o-Porirua.	Select stance	Part 1 Schedule 1		
	Map 85: Primary contact sites – Te Whanganui-a-Tara.	Select stance	Freshwater		

	Map 86: Unplanned greenfield areas – Porirua City Council.	Select stance	Part 1 Schedule 1		
	Map 87: Unplanned greenfield areas – Wellington City Council.	Select stance	Part 1 Schedule 1		
	Map 88: Unplanned greenfield areas – Upper Hutt City Council.	Select stance	Part 1 Schedule 1		
	Map 89: Unplanned greenfield areas – Hutt City Council.	Select stance	Part 1 Schedule 1		
	Map 90: Highest and high erosion risk land (Pasture) – Te Awarua-o-Porirua.	Select stance	Freshwater		
	Map 91: Highest erosion risk land (Woody vegetation) – Te Awarua-o-Porirua.	Select stance	Freshwater		
	Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua.	Select stance	Freshwater		
	Map 93: Highest and high erosion risk land (Pasture) – Te Whanganui-a-Tara.	Select stance	Freshwater		
	Map 94: Highest erosion risk land (Woody vegetation/clearance) – Te Whanganui-a-Tara.	Select stance	Freshwater		
	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.	Select stance	Freshwater		
	Map 96: Mākara catchment.	Select stance	Freshwater		
additional matter added by WWL	Rule R93: All other discharges to sites of significance and Rule R120: Activities in outstanding natural wetlands	Amend	Part 1 Schedule 1	Rules R93 and R120 should be added to the list of provision that will no longer apply to Whaitua Te Whanganui-a-Tara or Te Awarua-o-Porirua Whaitua. Wellington Water is concerned that if Rules R93 and R120 continued to apply, it would undermine the more permissive activity status proposed in PC1.	Insert 'Rule R93: All other discharges to sites of significance' and 'Rule R120: Activities in outstanding natural wetlands' to the list of provisions that will no longer apply to Whaitua Te Whanganui-a-Tara or Te Awarua-o-Porirua Whaitua.
additional matter added by WWL	definition of 'point source discharge'	Amend		The term "point source discharges" is used in a number of provisions that will continue to apply within the two whaitua. It would be useful to confirm that wastewater and stormwater discharges are not intended to fall within this definition.	Define "point source discharge" so that it clearly excludes discharges from wastewater and stormwater networks.
additional matter added by WWL	"New wastewater discharge" definition	Amend		Wellington Water suggests it may be necessary to revisit the existing definition of 'new wastewater discharge'. While this is not proposed to be changed by PC1, it will apply very differently within the two whaitua given the different definition of 'existing wastewater discharge' that will apply within those areas.	Any amendments as necessary to reflect the corresponding definition of 'existing wastewater discharge', including as it may be modified through the plan change process.
additional matter added by WWL	New commensurate" definition	Amend		Refer overarching submission point on "commensurate" reductions. Wellington Water has opposed wording to require reductions in contaminants 'commensurate with what is required in the receiving environment' to meet TAS. In the event that this relief is not accepted, and by way of alternative relief, Wellington Water seeks that "commensurate" is defined in PC1.	Add new definition as follows: Commensurate In the context of reductions in contaminants in wastewater or stormwater discharges, means a level of reduction that is both proportionate to the effect of the discharge on the receiving environment, and reasonably within the control of the applicant.
additional matter added by WWL	Objective O9	Amend		Wellington Water considers more specific objective and policy support is required in PC1 to ensure that the NRP gives effect to these aspects of national and regional policy direction, and for consistency with Objective O10 of the NRP, specifically in relation to wastewater infrastructure. Proposed PC1 policies should recognise that robust, cost-effective, and efficient wastewater and stormwater networks are essential to human health, human safety and social and cultural well-being. Also refer to comments in Section A of Wellington Water's submission.	Amend existing objective O9 as follows: The social, economic, cultural and environmental benefits of Regionally Significant Infrastructure, renewable energy generation activities and the utilisation of mineral resources are recognized and provided for.