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<p><b>*I wish to be heard in support of my submission at a hearing</b></p>	Yes
<p><b>*I would consider presenting a joint case at the hearing with others who make a similar submission</b></p>	Yes
<p><b>*I could gain an advantage in trade competition through this submission</b></p>	No
<p>Only answer this question if you answered 'yes' to the above question. <b>I am directly affected by an effect of the subject matter of the submission that:</b> <b>A) adversely affects the environment; and</b> <b>B) does not relate to trade competition or the effects of trade competition</b></p>	Select A or B
<p><b>In providing a submission to Greater Wellington, I agree to having read and understood the terms and process outlined in this <b>Information Statement</b></b></p>	
<p>If providing a submission on behalf of a company / organisation <b>I confirm that I have authority to do so:</b></p>	Ami Coughlan
<p><b>Date:</b></p>	15 December 2023

Please enter your feedback in the next worksheet "**2) Feedback on Provisions**". All of the provisions in the proposed change have been included so please place your comments in the corresponding cells.

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# Submission on the Greater Wellington Regional Council

## Natural Resources Proposed Plan Change 1

### Wellington Fish and Game Council

1. Wellington Fish and Game Council (WFGC) submits on Plan Change 1 to the Natural Resources Plan (NRP) for the Greater Wellington Region (GWR). WFGC confirms that it wishes to exercise its right to be heard in relation to this submission.
2. WFGC is the statutory body established under the Conservation Act 1987 responsible for the management of sports fish and gamebird resources in the Wellington Fish and Game region. Several of the gamebird species under WFGC's management are indigenous to New Zealand, and WFGC shares a particular interest in the maintenance of New Zealand's indigenous biodiversity alongside the interests of mana whenua and other New Zealanders.
3. WFGC's statutory management functions include the maintenance and enhancement of the habitat of sports fish and game – the rivers, lakes, streams and wetlands within which sports fish, gamebirds, and many indigenous taonga species thrive. WFGC is tasked by statute to advocate for protection and restoration of these habitats and works with Greater Wellington Regional Council (GWRC), mana whenua and community groups on habitat protection and restoration throughout the GWR.
4. In discharging its statutory responsibilities, WFGC represents the interests of over 8000 license holders (sports fish anglers and game bird hunters) in the region. These recreational pursuits are part of New Zealand's cultural heritage and are woven into the fabric of our society and ethos.
5. Many of these license holders are also rate payers and WFGC expects that their interests and the interests of all ratepayers in the region will be fairly represented in the NRP and into the future.

### Introduction

WFGC welcomes the stated focus of Proposed Plan Change 1 to implement Whaitua recommendations and the new national direction for freshwater management, amendments to the beds of lakes and rivers rules, amendments to air quality rules, and new sites with significant indigenous biodiversity values. It is noted that the Proposed Plan Change 1 also includes changes to the ways activities such as earthworks, stormwater and wastewater discharges, and land use are managed to achieve water quality and ecological health objectives within Whaitua Te Whanganui-a-Tara (TWT) and Te Awarua-o-Porirua Whaitua (TAoP).

WFGC strongly supports Te Mana o te Wai and the National Policy Statement for Freshwater Management the (NPS-FM 2020) and the central recognition that protecting the health of freshwater protects the health and well-being of the wider environment. The protection of GWR's rivers, lakes, streams, and wetlands is essential to WFGC's mission, and WFGC welcomes the opportunity to work with GWRC, mana whenua and the wider community to achieve the NPF-FM's objectives.

### Summary of Submission

- Healthy waterbodies and ecosystems are at the heart of the NPS-FM 2020 which directs that health and well-being of waterbodies must be improved if degraded and maintained (at a minimum) if healthy (Policy 5). Likewise, the purpose of the RMA 1991 includes “safeguarding the life-supporting capacity of air, water, soil, and ecosystems”.
- A functional NRP requires objectives, policies, methods, rules, timelines, and dates that are robust and scientifically based to succeed in restoring health to degraded waterbodies. The NRP needs to provide clear guidance as to how these will be incorporated into existing and future resource consents.
- WFGC want to see environmental outcomes set for the ecosystem health value which will deliver ecosystems with healthy structures and functions, a diversity and abundance of indigenous and valued introduced species appropriate to the location and time, the ability to be resilient to disturbance including climate change, and functioning natural connections and interactions between interconnected freshwater, coastal, and terrestrial ecosystems.
- Target Attribute States need to be set to allow for the maintenance and/or restoration of this level of ecosystem health, which in cases will likely involve setting limits and bottom lines well above the national bottom lines.
- All waterbodies, not just lakes and rivers, should have set Target Attribute States. This includes estuaries, wetlands, and groundwater. Wetlands in particular seem to be excluded in the NRP PC1 from having set Target Attribute States, and this should be rectified.
- It is important to include stakeholders in consultation and management planning, particularly those like WFGC who have statutory responsibilities to habitat and species management, for the depth of their knowledge and experience as environmental advocates.
- WFGC endorse freshwater action plans which protect, maintain, or enhance macroinvertebrate, periphyton, and fish abundance and community attributes as necessary and where applicable, and these communities need to also include life stage habitat protection actions for indigenous and valued introduced species.

- WFGC suggest regular assessments and evaluations of Schedule I important trout spawning and trout fishery rivers, potentially annually.
- Regular, meaningful updates and reports to statutory managers and other relevant collaborators of outcomes of management and action plans will be important to maintain collaboration and achieve environmental targets.
- WFGC support an increase in wetland and wetland habitat abundance and extent, for flood protection, in river corridors, on private and public land.
- It is vitally important to address and minimise the cumulative impacts of water takes and core allocation on water body and aquatic ecosystem health, and to reduce takes where rivers are suffering loss of natural form and character and ecosystem degradation due to insufficient water flow.
- It is also vital to manage stormwater, wastewater network catchment, and wastewater treatment plant discharges. Management and action plans should be SMART: Specific, Measurable, Ambitious but reasonable, Relevant, and Time-bound.
- Aquatic ecosystem health and wellbeing depends on managing diffuse discharges of nutrients and *E. coli* from farming activities. If current land use inputs of nutrients are not known, more conservative limits will need to be set to ensure the target reductions are achieved. Outcomes for Dissolved Inorganic Nitrogen concentrations should be set around 0.3 – 0.6 mg/L, and median Dissolved Reactive Phosphorus concentrations should be set at around 0.01 – 0.02 mg/L (Canning et al 2021). A comprehensive, regular, and frequent monitoring programme is needed to assess concentrations of these nutrients throughout the catchment and the year.
- Objectives, policies, methods, and rules which enable for reductions of phosphorus inputs into water are also important for increasing aquatic ecosystem health. Reductions to date have been linked to good farming and industry management practices, and the increased focus on phosphorus reduction in policy instruments (McDowell et al, 2018). As such, the NRP and other policy from GWRC can play a vital role in education, non-regulatory and regulatory methods to assist in reducing harm from this pollutant.
- Research indicates that ~2% of New Zealand waterways are naturally soft-bottomed, however due to sediment inputs into waterways, currently ~ 20% of New Zealand rivers and streams now appear to have soft sediment beds, rather than the natural hard-bottomed, stony bed they historically displayed (Clapcott et al, 2011). Restoring these silted streams should be a priority restoration, and monitoring should show this restoration over time.

- Sediment inputs into waterways from earthworks, land use, farming, and forestry must be tightly controlled and monitored to allow freshwater and coastal receiving environments to be restored to a state of health and wellbeing. Current sediment management practices do not effectively control the impact of sediment well enough to provide suitable habitat for some species to live in; sediment directly impacts fish and freshwater invertebrates, and smothers substrate, infilling habitat for native species, and containing nutrients and growing medium to encourage periphyton, algae, and macrophyte growth which further reduces habitat and food availability for macroinvertebrates and fish, and removes dissolved oxygen during night time respiration. As well as directly degrading aquatic ecosystems, sediment impacted rivers lose amenity, recreational, and cultural values. Allowing enough water to remain in riverine systems to consistently move sediment along in a manner compatible with the natural character of that catchment or system is also vital in managing sediment impacts.
- Long-term target attribute timeframes require interim target attribute state timeframes set for intervals of not more than 10 years with baselines which need to be achieved by the interim target date set. Short-term milestones are useful for maintaining momentum over the lifetime of a vision, and minimising the likelihood of delays and rushed, botched restoration attempts which are likely to be more expensive, and less effective.
- The policies governing adverse effects of stormwater discharges (e.g., Policy P.P10, Policy WH. P10) contain multiple clauses giving reasons to not put good management practices into effect. To ensure the national legislation directives are followed, it is essential that financial and economic reasons are not given precedence over restoration of degraded freshwater ecosystems.
- When discussing adverse environmental impacts of stormwater or wastewater discharges, it is also important to weight ecosystem health as dictated by the RMA 1991, NPS-FM 2020, and Te Mana o te Wai. Therefore, wherever adverse environmental effects are to be “avoided where practicable”, then the NPS-FM 2020 Section 3.21 to 3.24 requires a demonstration of a functional need for that activity, and if there is a functional need, then the effects management hierarchy must be applied. Neither the requirement for demonstrating functional need, and the effects management hierarchy appear to be mentioned in the NRP PC1, and this should be rectified to bring the Plan into alignment with current national directives.
- Threatened species management. If sports fish or game bird habitats and interactions are considered to potentially impact on nationally threatened freshwater species, WFGC as statutory managers and with comprehensive knowledge are required to be involved in any management plans and actions.

WFGC's detailed submissions on [the NRP Proposed Change 1](#) are set out in the table below. In summary, WFGC broadly supports many of the proposed changes. However, it recommends a number of amendments to address several central concerns and to better [achieve water quality and aquatic ecological health objectives](#).

Objective O18	<p>Rivers, lakes, natural wetlands and coastal water are suitable for contact recreation and Māori customary use</p> <ul style="list-style-type: none"> <li>a) Maintaining water quality or</li> <li>b) Improving water quality in (i) significant contact recreation freshwater bodies the primary contact recreation objectives table 3.1 (iii) all other rivers and lakes and natural wetlands to meet, as a minimum and within reasonable timeframes, the secondary recreation objectives in Table 3.2.</li> </ul>	Support
Objective O19	<p>Biodiversity, aquatic ecosystem health and mahinga kai in freshwater bodies and CMA are safeguarded such that:</p> <ul style="list-style-type: none"> <li>a) Water quality, flows, water levels, and aquatic and coastal habitats are managed to maintain biodiversity aquatic ecosystem health and mahinga kai, and</li> <li>b) Where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 isn't met, the waterbody of CMA is meaningfully improved so that the objective is met within a reasonable timeframe, and</li> <li>c) Restoration of aquatic ecosystem health and mahinga kai is encouraged</li> </ul> <p><i>Does not apply to Wellington &amp; Porirua Whaitua, and only natural wetlands.</i></p>	<p>Support with amendments</p> <p>Clause c) requires strengthening: restoration of a degraded system or ecosystem is necessary under the NPS-FM 2020, rather than merely encouraged.</p> <p>c) Aquatic ecosystem health and mahinga kai values are maintained where in good health and restored where degraded.</p>
Policy P30	<p>Manage the adverse effects of use and development on biodiversity, aquatic ecosystem health and mahinga kai to:</p> <ul style="list-style-type: none"> <li>a) Maintain or where practicable restore natural flow characteristics and hydrodynamic processes and the natural pattern and range of water level fluctuations in rivers, lakes, and natural wetlands, and</li> <li>b) Maintain or improve water quality including to assist with achieving the objectives in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 or within the TWT and TAoP Whaitua, and</li> </ul>	Support

	<ul style="list-style-type: none"> <li>c) Maintain, or where practicable restore aquatic habitat diversity and quality, including (i) the form, frequency, and pattern of pools, runs and riffles in the rivers, and (ii) the natural form of rivers, lakes, natural wetlands and the CMA, and</li> <li>d) Where practicable restore the connections between fragmented aquatic habitats, and</li> <li>e) Maintain or where practicable restore habitats that are important to the life cycles and survival of indigenous aquatic species and the habitats of indigenous birds in the CMA, natural wetlands, and the beds of lakes and rivers and their margins that are used for breeding, roosting, feeding, and migration, and</li> <li>f) Avoid, minimise or remedy adverse effects on aquatic species at times which will most affect the breeding, spawning, and dispersal or migration of those species... and,</li> <li>g) Maintain or where practicable restore riparian habitats, and</li> <li>h) Avoid the introduction, and restrict the spread, of aquatic pest plants and animals (as defined in the Wellington Regional Pest Management Strategy)</li> </ul>	
Policy P45	<p>Particular regard shall be given to the protection of trout habitat in rivers with important trout habitat identified in Schedule I. the effects of use and development in and around these rivers shall be managed to:</p> <ul style="list-style-type: none"> <li>a) Maintain or improve water quality, in accordance with the objectives in Tables 3.4 &amp; 3.5 in O10, Table 8.4 of Objective WH.09, and Table 9.2 of Objective P. 06, and</li> <li>b) Minimise changes in flow regimes that would otherwise prevent trout from completing their life cycle, and</li> <li>c) Maintain the amount of pool, run, and riffle habitat, and</li> <li>d) Minimise adverse effects on the beds of trout spawning waters identified in Schedule I</li> </ul>	Support
5.4.4	<p>Beds of lakes and rivers general conditions for the uses of the beds of lakes and rivers that apply as specified in Rules R122 to R129</p> <p>(f) in any part of the river or lake bed covered in water, which is identified as trout spawning waters in Schedule I, disturbance of the bed or diversions of water shall not take place during the spawning period of between 31 May and 31 August</p> <p>Same as operative NRP</p>	Support
5.4.8 R151A	<p>Ongoing diversion of a river – permitted activity</p> <p>The diversion of a river as a result of:</p>	Oppose.

	<p>a) An existing permanent diversions, that is not associated with existing structure, that was lawfully established by way of a resource consent as at the date of this rule becoming operative, or</p> <p>b) A permanent diversion, that is not associated with existing structures, that has been lawfully operated by way of a resource consent after the operative date of this rule, Is a permitted activity subject to the following conditions:</p> <p>c) The permanent diversion has been in place for at least 10 years and</p> <p>d) All of the conditions of the consent to lawfully establish the diversion have been complied with.</p> <p>Note: Diversion of water in association with existing structures is subject to permitted activity rule R122 (Maintenance, repair, replacement, upgrade or use of existing structure, excluding the Barrage Gates) – permitted activity.</p>	<p>Granting permitted activity status to permanent diversions which are over 10 years old risks grandfathering in inappropriate structures which create adverse environmental effects to waterbody flow, form, and character, as well as potential fish passage issues, all of which are contrary to Te Mana o te Wai, the NPS-FM (2020), and the RMA. Keeping river diversions as discretionary or restricted activities also allows for the uptake of new river management systems, ideas, and materials as knowledge and technologies progress.</p>
6.16	<p>Freshwater Action Plan programme</p> <p>Method M36: Wellington Regional Council will implement a programme to prepare, deliver, monitor and review Freshwater Action Plans or all part Freshwater Management Units identified in Schedule 27.</p> <p>Freshwater Action Plans will be:</p> <p>a) Developed in partnership with mana whenua, and informed by engagement with catchment communities, territorial authorities and stakeholders, and</p> <p>b) Prepare and published for all FMUs and/or part FMUs in the Wellington Region by December 2026, and</p> <p>c) Prepared for all attributes identified in Schedule 27 A2.</p> <p>Freshwater Action Plans may also be prepared for, or incorporate, actions for any other relevant target attribute state or environmental outcome identified in partnership with mana whenua or with the community.</p> <p>WRC, in partnership with mana whenua, and informed by engagement with catchment communities, territorial authorities and stakeholders, may make changes or additions to any</p>	Support

	<p>Freshwater Action Plans, at any time, for the purpose of achieving the target attribute states and/or environmental outcomes set in this Plan.</p> <p>WRC will monitor the effectiveness of the Freshwater Action Plans as appropriate and, at a minimum of 5 yearly intervals from the date of publication.</p> <p>All relevant WRC work programmes that impact on the achievement of target attribute states, and other freshwater objectives in this Plan will be integrated into the delivery of Freshwater Action Plans. Any programme external to WRC that will assist in achieving target attribute states may be included in the relevant Freshwater Action Plans.</p>	
Method M37	<p>Freshwater Action Plan for Parangarahu Lakes</p> <p>WRC will, in partnership with mana whenua, prepare and implement a FAP for the Parangarahu Lakes to contribute to achieving the target attribute states in O WH.03 Table 8.2 and environmental outcomes identified in that table 8.2 and including the huanga of mahinga kai and Māori customary use as identified with mana whenua.</p> <p>In accordance with Schedule 27. The Parangarahu Lakes Freshwater Action Plan will identify, in detail, the actions, including actions to support effective regulation, to contribute to achieving those target attribute states as above.</p>	Support
Method M38	<p>Freshwater Action Plan for the Rangituhi catchment.</p> <p>WRC will, in partnership with Ngati Toa Rangatira, prepare a FAP for the Rangitui catchment to contribute to achieving the target attribute states identified in Objectives O.03 Table 9.1 and P.06 Table 9.2 and relevant environmental outcomes identified in Objective P. 03 and P. 06 and including the the huanga of mahinga kai and Māori customary use as identified by Ngati Toa Rangatira.</p> <p>In accordance with Schedule 27, the Rangitui FAP will identify, in detail, the target attribute states and environmental outcomes in Objectives as above.</p> <p>The Rangitui FAP will include:</p> <ul style="list-style-type: none"> <li>a) Prioritising improvements to hotspot areas of elevated metal concentrations within the harbour, and</li> <li>b) Implementing a targeted pollution prevention programme, and</li> </ul> <p>identifying areas of piped stream in the lower reaches of the Rangitui catchment that could be daylighted.</p>	Support
Method M39	<p>Freshwater Action Plans for nationally threatened freshwater species within TWT and TAoP</p> <p>WRC will, in partnership with mana whenua, prepare and implement a Freshwater Action Plan for the nationally threatened freshwater species within TWT and TAoP, comprising species-</p>	Support with amendments. If sports fish or game bird habitats and interactions are considered to

	<p>specific modules that will set out actions to contribute to achieving Objective WH.04 and P.04. These modules will also identify indicators and measures of nationally threatened freshwater species for:</p> <ul style="list-style-type: none"> <li>a) habitat extent and condition, focusing on the critical habitat attributes identified in Schedules A2, F1, F2, and F3, and</li> <li>b) population abundance, composition, condition, and distribution.</li> </ul>	<p>potentially impact on nationally threatened freshwater species, WFGC as statutory managers and with comprehensive knowledge to be involved in management plans and actions.</p>
Method M40	<p>Fish passage action plan for TWT and TAoP. WRC will, in partnership with mana whenua, prepare and deliver a fish passage action plan programme for TWT and TAoP. This will include:</p> <ul style="list-style-type: none"> <li>a) identifying all fish passage barriers on public land by within 5 years of the notification of this plan, and, as far as practicable, on all private land by 1 November 2033, and</li> <li>b) priorities remediation of fish passage (if appropriate to protect species) in locations highly valued for their indigenous fish and mahinga kai species, and</li> <li>c) regular public reporting on the progress of identification and remediation of fish passage.</li> </ul>	<p>Support with amendments.</p> <p>Where collaboration is required, it is important to include stakeholders, particularly those like WFGC who have statutory responsibilities to habitat and species management, for the depth of their knowledge and experience as environmental advocates.</p> <p>If sports fish or game bird habitats and interactions are considered to potentially impact on nationally threatened freshwater species, WFGC as statutory managers and with comprehensive knowledge to be involved in management plans and actions.</p>
Method M41	<p>Identifying and responding to degradation in freshwater bodies within TWT and TAoP WRC will identify degradation of freshwater bodies within both Whaitua. This programme will, at least once every 5 years, publish information identifying degrading trends for water bodies. Any such analysis may be part of a plan effectiveness or action plan review or part of any other process.</p> <p>Where degradation is identified and confirmed as not being due to a naturally occurring process, WRC will take action to halt degradation and improve the health of that waterbody towards the relevant target attribute state of environmental outcome by preparing and</p>	<p>Support</p>

	<p>delivering a FAP and/or undertaking a review of regulations and effectiveness of their implementation.</p> <p>Where it is determined that a regulatory response is required to halt degradation, WRC will undertake a plan change for the relevant areas as soon as practicable after degradation is confirmed.</p>	
Method M43	<p>Supporting the health of urban waterbodies.</p> <p>WRC will undertake programme(s) to support the health of waterbodies, including rivers and streams, estuaries and harbours, impacted by urban activities, including to:</p>	There will need to be adequate resourcing of compliance and monitoring staff to enable these targets to be met.
Method M44	<p>Supporting the health of rural waterbodies.</p> <p>WRC, working with primary sector organisations, will undertake a programme to support the health of waterbodies, including rivers, streams, estuaries and harbours, impacted by rural activities, including to:</p> <ul style="list-style-type: none"> <li>a) investigate financial support and rates relief options for accelerating retirement/revegetation of pastoral and plantation forestry land uses, and</li> <li>b) support the effective uptake and implementation of Farm Environment Plans and</li> <li>c) promote uptake of good management practice in rural land uses, including for pastoral farming and plantation forestry, and</li> <li>d) develop and deliver a specific programme of engagement and education with small (&lt;20ha) landowners.</li> </ul>	Support.
Objective WH.01	<p>The health of all freshwater bodies and the CMA within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.</p> <p>Note: in the wai ora state: ahua (natural character) is restored and freshwater bodies exhibit their natural quality, rhythms, range of flows, form, hydrology and character. All freshwater bodies have planted margins. All freshwater bodies and coastal waters have health functioning ecosystems and their water conditions and habitat support the presence, abundance, survival, and recovery of at-risk and threatened species and taonga species. Mahinga kai and kai moana species are healthy, plentiful enough for long term harvest and are safe to harvest and eat or use, including for manuhiri and to exercise manaakitanga. Mana whenua are able to undertake customary practices at a range of places throughout the catchment.</p>	Target Attribute States require interim target attribute states set for intervals of not more than 10 years with baselines which need to be achieved by the interim target date.

Objective WH.02	<p>The health and wellbeing of Te Whanganui-a-Taras groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora, such that by 2040:</p> <ul style="list-style-type: none"> <li>a) water quality, habitats, water quantity and ecological processes are at a level where the state of aquatic life is maintained, or meaningful progress has been made towards improvement where degraded, and</li> <li>b) the hydrology of rivers and erosion processes, including bank stability are improved and sources of sediment are reduced to a more natural level and,</li> <li>c) the extent and condition of indigenous riparian vegetation is increased and improved and</li> <li>d) the diversity, abundance, composition, structure, and condition of mahinga kai species and communities are increased and</li> <li>e) huanga of mahinga kai and Māori customary use for locations identified in Schedule B are maintained or improved and</li> <li>f) mana whenua can safely connect with freshwater and enjoy a wider range of customary and cultural practices including mahinga kai gathering, and</li> <li>g) mana whenua and communities can safely connect with freshwater and enjoy a wider range of activities, including swimming and food gathering, and</li> <li>h) freshwater of a suitable quality is available for the health needs of people</li> </ul>	<p>Support with amendments:</p> <p>Valued introduced species have legislative protections, and protections of their habitats which often lead to improvements for indigenous freshwater species. A note in clause c) could cover the requirements for these species:</p> <p>c) diversity, abundance, composition, structure, and condition of mahinga kai species and communities, <u>including valued introduced species</u>, has increased.</p>
Objective WH.03	<p>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 and by 2040:</p> <ul style="list-style-type: none"> <li>a) sediment inputs into the Makara Estuary are reduced, and</li> <li>b) high contaminant concentrations, including around discharge points, are reduced, and</li> <li>c) diversity, abundance, composition, structure and condition of mahinga kai species and communities has increased and</li> <li>d) huanga of mahinga kai and Māori customary use for locations identified in Schedule B are maintained or improved and</li> <li>e) the extent and condition of estuarine seagrass, saltmarsh and brackish water submerged macrophytes are increased and improved to support abundant and diverse biota, and</li> </ul>	<p>Support with amendments:</p> <p>Valued introduced species have legislative protections, and protections of their habitats which often lead to improvements for indigenous freshwater species. A note in clause c) could cover the requirements for these species:</p> <p>c) diversity, abundance, composition, structure, and condition of mahinga kai species</p>

	<ul style="list-style-type: none"> <li>f) coastal areas support healthy functioning ecosystems, and their water conditions and habitats support the presence, abundance, survival and recovery of At-Risk and Threatened species and taonga species and</li> <li>g) mana whenua can safely connect with the CMA and enjoy a wider range of customary and cultural practices including mahinga kai gathering, and</li> <li>h) mana whenua and communities can safely connect with the CMA and enjoy a wider range of activities, including swimming and food gathering.</li> </ul>	and communities, <u>including valued introduced species</u> , has increased.
Objective WH.04	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.	Support with amendments. If sports fish or game bird habitats and interactions are considered to potentially impact on nationally threatened freshwater species, WFGC to be involved in management plans and strategy creation as the statutory managers of these and as the organisation with the comprehensive knowledge to be involved in management plans and actions.
Objective WH.06	Groundwater flows and levels, and water quality, are maintained at levels that	Support
Objective WH. 07	The physical integrity of aquitards is protected so that confined aquifer pressures are maintained	Support – needs elaborating, removal of aquifer water via bore extraction can cause aquitards to collapse (Zhang et al, 2014). How will this be prevented?
Objective WH. 08	<p>Primary contact sites within the Hutt River, Pakuratahi River, Akatarawa River, and Wainuiomata River are suitable for primary contact by ensuring that by 2040:</p> <ul style="list-style-type: none"> <li>a) <i>E. coli</i> concentrations are at least maintained, or improved where the target attribute states in Table 8.3 are not met, and</li> <li>b) there is low risk of health effects from exposure to benthic cyanobacteria</li> </ul>	Are these the only factors causing the waterbodies to be unsuitable for contact recreation, or are there other impacts which need to be managed to create primary contact sites within these rivers?

Objective WH. 09	Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved by ensuring that:	Support
Policy WH.P1	Improvement of aquatic ecosystem health. Aquatic ecosystem health will be improved by:	Support
Policy WH. P2	Management of activities to achieve target attribute states and coastal water objectives. Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by:	Support
Policy WH. P3	Freshwater Action Plans role in the health and wellbeing of waterways. The WRC shall, in partnership with mana whenua, prepare and deliver Freshwater Action Plans in accordance with Schedule 27. The first iteration of Freshwater Action Plans, to cover all rivers and lakes in the TWT Whaitua, shall be complete by December 2026. Freshwater Action Plans shall identify, in detail, the actions, including to support effective regulation, to achieve the target attribute states and support relevant environmental outcomes, set in this Plan.	Will require resourcing of staff to process and training to create the Freshwater Action Plans
Policy WH. P4	To achieve the visual clarity target attribute states in Table 8.4 in part FMUs where the target attribute state is: a) met, the mean annual sediment load must be at least maintained, and b) where it is not met, the mean annual sediment load must be reduced as set out in Table 8.5	Support
Policy WH. P5	The localised adverse effects of point source discharges to freshwater and coastal water beyond the zone of reasonable mixing are avoided or minimised, including by avoiding: e) any significant adverse effects on aquatic life including through (i) change in temperature, (ii) reduced dissolved oxygen in surface water bodies, or (iii) increased toxicity effects	Does this include through increasing algal / macrophyte growth which removes O2 at night, or substrate infill from inputs from point source discharges too? If so, this should be explicitly mentioned where appropriate in the NRP
Policy WH. P6	The cumulative adverse effects of point source discharges, excluding stormwater network and wastewater discharges, to water are avoided, and: –	Support with minor typographical amendments: (b) part Freshwater Management Uinits (should be Units).

<p>Policy WH. P7</p>	<p>Discharges to groundwater. All discharges to land that may enter groundwater, and discharges to groundwater, shall not degrade the quality of the groundwater, and where the quality of the groundwater is degraded, existing discharges shall be managed to improve groundwater quality</p>	<p>The outcome and goal of improvement should be clearly stated here.</p> <p>.. and where the quality of the groundwater is degraded, existing discharges shall be managed to improve groundwater quality <u>to a state of health and wellbeing such that the groundwater as tested will no longer be contributing to degradation of downstream aquatic environments or public health.</u></p>
<p>Policy WH. P9</p>	<p>General stormwater policy to achieve the target attribute states and coastal water objectives.</p> <p>Stormwater discharges to a surface water body or coastal water, or onto land in a manner that may enter freshwater or coastal water, are managed so that the baseline water quality state for copper and zinc is maintained, or improved where degraded, including in the relevant part FMU or coastal water management unit, or order for the coastal water objectives and TAS to be met by the timeframes set out in Tables 8.1 and 8.4.</p>	<p>Support with amendments.</p> <p>This Target Attribute State timeframe of by 2040 requires interim target attribute states set for intervals of not more than 10 years with baselines which need to be achieved by the interim target date deadline.</p>
<p>Policy WH. P10</p>	<p>Managing adverse effects of stormwater discharges.</p> <p>c) installing where practicable a stormwater treatment system where all clauses are talking about why they shouldn't be installed., including</p> <p>(iv) costs</p>	<p>If there is a functional need for the activity to occur, then the effects management hierarchy should be embedded in this clause as a directive for future consent pathway as per the NPS-FM 2020 3.21</p>

		(iv) It is important that stormwater inputs are addressed, and the costs of this are not passed on to the environment, and everyone who interacts with that downstream environment. Costs and economic feasibility should not be used as a 'get out of doing the right thing' card for developers, councils etc.
Policy WH. P11	Discharges of contaminants in stormwater from high risk industrial or trade premises	Support
Policy WH. P13	Managing stormwater network discharges through a Stormwater Management Strategy (SMS)	Support
Policy WH. P14	Stormwater discharges from new and redeveloped impervious surfaces	Support
Policy WH. P15	Stormwater contaminant offsetting for new greenfield development – adverse effects of residual stormwater contaminants, roads, and state highways where the discharge will enter a surface water body or coastal water are to be offset by way of a financial contribution in accordance with Schedule 30.	Financial contributions must be set at a level that will accurately reflect the costs of improvements and upgrades to the stormwater systems to allow for improvements in effects of stormwater on receiving waterbodies. These contributions will have to be flexible, as costs of repairs, maintenance, and upgrades change in response to global economics, supply and demand.
Policy WH. P17	General wastewater policy to achieve TAS and coastal objectives.	Support
Policy WH. P18	Progressing works to meet <i>E. coli</i> TAS: works shall be progressed as soon as practicable in order for the <i>E. coli</i> TAS to be achieved by the timeframe in Table 8.4 through:	Support. Timeline will require interim time frame targets to be set and monitored in a stepwise approach to achieve the 2040 deadline.

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:	Support
Policy WH. P20	All existing wastewater discharges from a treatment plant shall be managed by:	Support
Policy WH. P21	Managing diffuse discharges of nutrients and <i>E. coli</i> from farming activities by:	Support
Policy WH. P22	<p>Diffuse nitrogen discharges from large rural properties and from smaller rural properties that are intensively farmed, are capped, minimised and, on large properties and horticultural properties, reduced where necessary by ensuring that:</p> <ul style="list-style-type: none"> <li>a) the risk of diffuse discharge of nitrogen is assessed objectively using a recognised nitrogen risk assessment tool to determine the risk</li> <li>b) the nitrogen discharge risk does not increase over times, and</li> <li>c) for pastoral land use or arable land use on 20 ha or more of land, or horticultural land use on 5 ha or more of land (iii) in part FMUs where Table 8.4 shows that the baseline state of dissolved inorganic nitrogen or nitrate exceeds the TAS, the nitrogen discharge risk is reduced to the extent reasonably practicable.</li> </ul>	Requesting a reduction in nitrogen discharge risk “to the extent reasonably practicable” (clause c) in waterbodies which have been degraded by nutrient inputs is unlikely to achieve any measure of improvement as required by national legislation such as the RMA 1991, the NPS-FM 2020, and Te Mana o te Wai. This policy should be strengthened, with time-bound and measurable actions which will return degraded waterways in a stepwise fashion to a state of health and wellbeing.
Policy WH. P23	Reduce discharges of sediment from farming activities on high erosion risk land by:	Support
Policy WH. P 24	Farm environment plans (FEP) required in accordance with Policy WH.P22 and WH.P23 shall be provided according to a phased timetable that prioritised those part FMUs where Table 8.4 shows that suspended fine sediment has a baseline state of D and/or where dissolved inorganic nitrogen is shown as being in need of improvement, and so that, in all cases, FEPs are prepared and certified by 30 June 2027	This will need resourcing for consultants able to certify effective FEPs.
Policy WH. P25	Manage the actual and potential adverse effects of changing land use from low to higher intensity rural land use by:	Support
Policy WH. P26	<p>Managing livestock access to small rivers:</p> <p>In addition to national stock exclusion regs and the region-wide stock access requirements of Rule R98 or Rule 100 in this Plan, restrict livestock access to a river in the Makara stream and Mangaroa River catchments where the baseline state for the relevant part FMS is below the national bottom line for visual clarity.</p>	Support

Policy WH. P27	Contribute to the achievement of aquatic ecosystem health by promoting the progressive shading of streams where nutrient reductions alone will be insufficient to achieve the periphyton TAS in Table 8.4	Support
Policy WH. P28	Achieving reductions in sediment discharges from plantation forestry.	Support
Policy WH. P29	<p>The risk of sediment discharges from earthworks shall be managed by:</p> <p>(a) requiring retention of soil and sediment on the land using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in accordance with GW Erosion and Sediment Control Guideline (2021), for the duration of the land disturbance, and:</p>	<p>If the Erosion and Sediment Control Guideline (2021) was sufficient there would be no sediment in waterways from earthworks from the time that Guideline was made applicable. However, earthworks are still currently noted to cause sediment inputs into waterways around the region, and so increased measures to control these inputs are required.</p>
Policy WH. P30	The discharge of sediment from earthworks over an area greater than 3,000m <sup>2</sup> shall:	<p>If the Erosion and Sediment Control Guideline (2021) was sufficient there would be no sediment in waterways from earthworks from the time that Guideline was made applicable. However, earthworks are still currently noted to cause sediment inputs into waterways around the region, and so increased measures to control these inputs are required.</p> <p>This policy does discuss visual monitoring, which is great to see.</p> <p>Clause (a) locks in the ability to keep pumping sediment into</p>

		<p>already sediment laden rivers. This will not allow for improvement in degraded waterways and is therefore not in alignment with Te Mana o te Wai, the RMA (1991), or the NPS-FM (2020).</p> <p>Likewise, the action suggested in clause c) should those visual clarity triggers be reached is to report the results to GWRC, rather than any practical methodologies such as halting work and allowing the waterway time to clear. Reports, while valuable for preventing further incidents, do little to protect waterways from immediate harm from earthworks.</p>
Policy WH. P31 (new)	Winter shutdown of earthworks.	Support
Objective P.01	The health of TAoPW's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100.	Support with amendments. Interim targets will be required which set out SMART goals which allow reportable stepwise improvements on target to the goal.
Objective P. 02	<p>TAoP 's groundwater, rivers, lakes and natural wetlands, and their margins, are on a trajectory of measurable improvement towards wai ora, such that by 2040:</p> <ul style="list-style-type: none"> <li>a) water quality, habitats, water quantity and ecological processes are at a level where the state of aquatic life is meaningfully improved</li> <li>g) mana whenua and communities can safely connect with waterbodies and enjoy a wider range of activities, including swimming, paddling, and food gathering</li> </ul> <p>the freshwater environment outcomes must contribute to the:</p>	Support with amendments. Interim targets will be required which set out SMART goals which allow reportable stepwise improvements on target to the goal.

	h) maintenance and improvement of the health and wellbeing of estuaries, harbours, and open coastal areas	
Objective P. 03	The health and wellbeing of coastal water quality, ecosystems and habitats in Pauatahanui Inlet, Onetpoto Arm, and the open coastal areas of T AoP is maintained or improved to achieve the coastal water objectives set out in table 9.1 and by 2040:	Support with amendments. Interim targets will be required which set out SMART goals which allow reportable stepwise improvements on target to the goal.
Objective P. 04	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 are occur are increased, improving their threat classification status	Support with amendments. If sports fish or game bird habitats and interactions are considered to potentially impact on nationally threatened freshwater species, WFGC to be involved in management plans and strategy creation as the statutory managers of these and as the organisation with the comprehensive knowledge and management experience to be involved in management plans and actions.
Objective P.05	Groundwater flows and levels, and water quality, are maintained at levels that protect:	Support
Objective P. 06	Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved by ensuring that:	Support
Policy P. P1	Improvement of aquatic ecosystem health.	Support
Policy P. P2	Management of activities to achieve TAS and coastal water objectives	Support
Policy P. P3	Freshwater Action Plans role in the health and wellbeing of waterways: the first iteration of Freshwater Action Plans to cover all rivers and lakes in TWoP shall be completed by December 26. Freshwater Action Plans shall identify, in detail, the actions, including to support effective regulation, to achieve the TAS and support relevant environmental outcomes, set in this plan	Support
Policy P. P4	Contaminant load reductions.	Support

Policy P. P5	Point source discharges: the cumulative effects of point source discharges, excluding stormwater network and wastewater discharges, to water are avoided, and:	Support
Policy P. P7	Discharges to groundwater	Support
Policy P. P8	Avoiding discharges of specific products and waste	Support
Policy P. P9	General stormwater policy to achieve the TAS states and coastal water objectives	Support
Policy P. P10	Managing adverse effects of stormwater discharges c) installing, where practicable, a stormwater treatment system for stormwater discharges from a property or properties taking into account: (iv) inspections, monitoring and ongoing maintenance, including costs, to maintain functionality in terms of treatment quality and capacity, and:	It is important that stormwater inputs are addressed, and the costs of this are not passed on to the environment, and everyone who interacts with that downstream environment. Costs should not be used as a 'get out of doing the right thing' card for developers, councils, etc.  If there is a functional need for the activity to occur, then the effects management hierarchy should be embedded in this clause as a directive for future consent pathway as per the NPS-FM 2020 3.21
Policy P. P11	Discharges of a contaminant in stormwater from high risk industrial or trade premises avoiding contaminants of hazardous substances being entrained in stormwater and discharges to a surface water body or coastal water, including via the stormwater network, or where avoidance is not practicable, implementing good management practice to avoid or minimise adverse effects on the environment including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and:	Support with amendments. The emphasis in clause b) on not practicable, gives an appearance of leeway in allowing pollutants to enter the waterways. Rephrasing this may emphasise the necessity for all means available to be used to prevent contaminant release into the environment. For example:

		<p>avoiding contaminants of hazardous substances being entrained in stormwater and discharges to a surface water body or coastal water, including via the stormwater network, <u>or if contaminant release can be demonstrated to have been unavoidable</u>, implementing good management practice to avoid or minimise adverse effects on the environment including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and:</p> <p>applying the effects management hierarchy where activity demonstrates a functional need to operate.</p>
Policy P. P12	Managing stormwater network discharges through a Stormwater Management Strategy	Support
Policy P. P16	General wastewater policy to achieve TAS an coastal water objectives.	Support
Policy P. P17	Progressing works to meet E.coli TAS	Support
Policy P. P21	Capping, minimising and reducing diffuse discharges of nitrogen from farming activities	Diffuse discharges of nitrogen should be reduced where nitrogen use and leaching makes this necessary, regardless of size of property.

		Diffuse nitrogen discharges from large rural properties and from smaller rural properties that are intensively farmed, are capped, minimising, and <del>on large properties</del> reduced where necessary by ensuring that:
Policy P. P22	Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Support
Policy P. P23	Phasing of farm environment plans	Support
Policy P. P25	Promote stream shading	Support
Policy P. P30	Minimum flows and minimum water levels in TAoP <ul style="list-style-type: none"> <li>a) for catchment management units in Table 9.6 the minimum flows in Table 9.6, and</li> <li>b) for rivers not in Table 9.6 90% of MALF and</li> <li>c) for natural lakes, existing water levels</li> </ul>	No decrease in number or extent of wetlands and increase in wetland number and extent where practicable.
Policy P. P31	Water takes at minimum flows and minimum river levels: The take and use of water from a river, Category A groundwater and Category B ground water (stream depletion) shall not occur when flows or water levels fall below minimums flows or minimum water levels in P. P30 with the exception that water is available below minimum flows or minimum water levels: <ul style="list-style-type: none"> <li>A) for firefighting, an individual's reasonable domestic needs and the reasonable needs of a person's animals for driving water as provided for by sections 14 (3) (b) and 14 (3) (e) of the RMA, or</li> <li>B) as authorised by any existing resource consent</li> </ul>	In order to give effect to Te Mana o te Wai and the NPSFM 2020, resource consents contributing to cumulative overallocation of a catchment or waterbody should be phased out to allow a return to health natural flow, form and characteristics of the water body affected.
Policy P. P32	Allocation in the TAoP	Support
Schedule B 1.	Freshwater Action Plan requirements: Principles. Freshwater Action Plans will: <ul style="list-style-type: none"> <li>1. be prepared in partnership with mana whenua, and</li> <li>5. be prepared at different scales (e.g., part FMUs, whole FMUs, or smaller sub-catchments) according to the scale most useful to implementing action and the needs of mana whenua and the affected community, and</li> <li>7. address the health of all waterways within the area of the Freshwater Action Plan and not be limited to only achieving the TAS in the monitored waterbody, and</li> </ul>	Support clauses 1 and 8 with amendments.  Support clauses 5 and 7.  Include stakeholders, particularly those like WFGC who have statutory responsibilities to habitat

	<p>8. recognise the value and necessity of integrated management planning and delivery.</p>	<p>and species management, for the depth of their knowledge and experience as environmental advocates.</p> <p>Freshwater Action Plans will:</p> <ol style="list-style-type: none"> <li>1. be prepared in partnership with mana whenua and <u>stakeholders</u>, and</li> <li>8. recognise the value and necessity of integrated management planning and delivery, <u>including collaborating with stake holders and statutory managers in the planning process for their expertise and knowledge.</u></li> </ol>
B2:	<p>General content</p> <ol style="list-style-type: none"> <li>1. A Freshwater Action Plan may: <ol style="list-style-type: none"> <li>a) Contain any other attribute of environmental outcome identified in partnership with mana whenua or through consultation with local communities, provided any additional goals do not detract or prevent the relevant TAS identified to be achieved.</li> </ol> </li> </ol>	<p>Support with amendments. Include stakeholders, particularly those like WFGC who have statutory responsibilities to habitat and species management, for the depth of their knowledge and experience as environmental advocates.</p> <ol style="list-style-type: none"> <li>1. A Freshwater Action Plan may: <ol style="list-style-type: none"> <li>a) Contain any other attribute of environmental outcome identified in partnership</li> </ol> </li> </ol>

		with mana whenua or through consultation with <u>stakeholders</u> and local communities, provided any additional goals do not detract or prevent the relevant TAS identified to be achieved.
B3:	<p>Freshwater Action Plans prepared in TWT and TAoP will include the following necessary actions as applicable:</p> <ol style="list-style-type: none"> <li>1. For macroinvertebrate, periphyton, and fish attributes</li> </ol>	Support with amendments: WFGC endorse freshwater action plans which protect, maintain, or enhance macroinvertebrate, periphyton, and fish abundance and community attributes as necessary and where applicable, where these communities also include life stage habitat protection actions for indigenous and valued introduced species.
Schedule 31:	<p>Stormwater Management Strategy: TWT and TAoP</p> <p>Strategic actions (b) set out the methodology, including information requirements and engagement with mana whenua and the community</p> <p>Management options (h) describe the mātauranga monitoring, receiving environment monitoring, and monitoring to be undertaken to support the modelling.</p>	<p>Support (b) with amendments. Include stakeholders, particularly those like WFGC who have statutory responsibilities to habitat and species management, for the depth of their knowledge and experience as environmental advocates.</p> <p>(b) set out the methodology, including information requirements and engagement with mana whenua, <u>stakeholders</u>, and the community.</p>

		<p>Management options (h) monitoring and management should be undertaken in collaboration with WFGC where detrimental effects are likely to impact trout habitat, trout spawning habitat, and habitat allowing for life cycle movement of trout and sports fish.</p>
<p>Schedule 32:</p>	<p>Wastewater Network Catchment Improvement Strategy  Strategic actions  (h) set out the methodology, including information requirements and engagement with mana whenua and the community.</p>	<p>Support with amendments. Include stakeholders, particularly those like WFGC who have statutory responsibilities to habitat and species management, for the depth of their knowledge and experience as environmental advocates.</p> <p>(h) set out the methodology, including information requirements and engagement with mana whenua, <u>stakeholders</u>, and the community.</p>

## Conclusion

WFGC is supportive of the implementation of Whaitua recommendations for Te Awarua-o-Porirua Whaitua and Te Whaitua Whanganui-a-Tara into the GWRC NRP PC1. WFGC is also highly supportive of the ecosystem and freshwater health focus of this Proposed Plan Change 1.

However, the lack of consultation during the drafting process with WFGC as statutory managers of the sports fish and game bird resources, and the limited involvement with the wider community in the process (acknowledged in pages 12 and 27 of the Section 32 evaluation report of this PC1) raises concerns regarding whether the process of the NPSFM 2020 has been followed correctly, particularly Section 3.2 (b), which requires every regional council to engage with communities and tangata whenua to identify long-term visions, environmental outcomes, and other elements of the NOF.

Further to this, the lack of communication with WFGC during the development of this PC1 is surprising, as the protections for the habitat of trout and salmon is enshrined in the Resource Management Act (1991), the Natural and Built Environments Act (2022), and the NPSFM (2020). As a leading advocate for wetland and freshwater habitat with statutory and legislative responsibilities, WFGC should have been involved in this process from the outset. While the acknowledgement of trout spawning habitat, trout habitat, fishing and recreation in this Plan is well worded and expressed, it falls short of the mark in acknowledging the requirement to protect the habitat for trout and salmon insofar as this is consistent with protections of the habitats of indigenous freshwater species (Policies 10 and Policies 9 of the NPSFM 2020, respectively).

The NPSFM 2020 also states in Appendix 1B (other values that must be considered), that where FMUs or parts thereof have fishing values, attributes associated with this fishing value (for both indigenous and valued introduced freshwater fish) need to be specifically targeted to allow the numbers of fish to be sufficient and suitable for human consumption. This information can only be ascertained in communication between those groups mandated to manage these resources and treasures, including Regional Council, tangata whenua/mana whenua, Fish and Game, and the Department of Conservation.

WFGC appreciates the opportunity to comment on this Plan Change 1 and understands the time pressures and urgency of this body of work. However, limited engagement with community and no engagement WFGC has potentially circumvented important aspects of the NPSFM 2020 and allows for the possibility of the Plan to continue to not fulfil national level legislative obligations for freshwater health in key areas, particularly around sediment and pollutant inputs into waterways, continued over allocation of water, and the importance of valued introduced species for ecosystem and habitat health.

WFGC wish to be heard in respect of this submission.

Yours sincerely

Ami Coughlan

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