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Please enter your details below	
*Submitter Name: Full name, or Name of Organisation / Company	Environmental Defence Society Inc.
Contact person for submission: (If different to above)	Shay Schlaepfer
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*I wish to be heard in support of my submission at a hearing	Yes
*I would consider presenting a joint case at the hearing with others who make a similar submission	Yes
*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 the terms and procees outlined in this Information Statement	
If providing a submission on behalf of a company / organisation I confirm that I have authority to do so:	Shay Schlaepfer
Date:	15-Dec-23
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 correponding cells. If you have questions on how to use this submission form please vist our Submitter User Help Guide or email one of our friendly team at regionalplan@gw.govt.nz	

Chapter No and Name	Provision No. & Title	Type of Change	Stance	RMA Process	Reason for feedback:	Decision Sought *
		Amended New Not applicable to Whaitua Not applicable to Te-Awarua-o- Porirua N/A	Support Oppose Neutral Amend Not stated	Freshwater Part 1 Schedule 1 Both	Please provide a summary of the reasons for your feedback on each provision to help us understand your position.	Please describe the actual changes to the provision that you would like to see and, where possible, include your suggested alternative wording. NOTE: Any deletions should be identified using strike through , and insertions should be identified using bold .
2 Interpretation	2.2 Definitions	Amended		Both		
	Afforestation	New	Amend	Freshwater	Refers to outdated regulations	Refer to updated regulations - NES-CF
	Allocation amount	Amended	Select stance	Part 1 Schedule 1		
	Annual stocking rate	New	Select stance	Freshwater		
	Catchment management unit	Amended	Select stance	Part 1 Schedule 1		
	Coastal water management units	New	Select stance	Part 1 Schedule 1		
	Containment standard	New	Select stance	Part 1 Schedule 1		
	Core allocation	Amended	Select stance	Part 1 Schedule 1		
	Dry weather discharges	New	Select stance	Part 1 Schedule 1		
	Earthworks	New	Amend	Part 1 Schedule 1	Refers to outdated regulations	Refer to updated regulations - NES-CF
	Effective hectares	New	Select stance	Freshwater		
	Environmental outcomes	New	Select stance	Part 1 Schedule 1		
	Erosion and sediment management plan	New	Select stance	Freshwater		
	Erosion risk treatment plan	New	Select stance	Freshwater		
	Existing wastewater discharge	New	Select stance	Part 1 Schedule 1		
	Harbour arm catchments	New	Select stance	Part 1 Schedule 1		
	Harvesting	New	Amend	Freshwater	Refers to outdated regulations	Refer to updated regulations - NES-CF
	High risk industrial or trade premise	New	Select stance	Part 1 Schedule 1		
	Highest erosion risk land (plantation forestry)	New	Select stance	Freshwater		
	Highest erosion risk land (pasture)	New	Select stance	Freshwater		
	High erosion risk land (pasture)	New	Select stance	Freshwater		
	Highest erosion risk land (woody vegetation)	New	Select stance	Freshwater		
	Hydrological control	New	Select stance	Part 1 Schedule 1		
	Impervious surfaces	New	Select stance	Part 1 Schedule 1		
	Intensive grazing	New	Select stance	Freshwater		
	Limit	New	Select stance	Part 1 Schedule 1		
	Mechanical land preparation	New	Amend	Freshwater	Refers to outdated regulations	Refer to updated regulations - NES-CF
	Nationally threatened freshwater species	New	Amend	Part 1 Schedule 1	Does not align with NPSFM, which is "threatened species"	Amend to "threatened species"
	Nitrogen discharge risk	New	Select stance	Freshwater		
	Part Freshwater Management Unit	New	Select stance	Freshwater		
	Primary contact sites	New	Select stance	Freshwater		
	Recognised Nitrogen Risk Assessment Tool	New	Select stance	Freshwater		
	Redevelopment	New	Select stance	Part 1 Schedule 1		
	Registration	New	Select stance	Freshwater		
	Registered forestry adviser	New	Select stance	Freshwater		
	Replanting	New	Amend	Freshwater	Refers to outdated regulations	Refer to updated regulations - NES-CF
	Sacrifice paddocks	New	Select stance	Freshwater		
	Small stream riparian programme	New	Select stance	Freshwater		
	Stabilisation	New	Select stance	Part 1 Schedule 1		
	Stormwater	Amended	Select stance	Part 1 Schedule 1		
	Stormwater catchment or sub-catchment	New	Select stance	Part 1 Schedule 1		
	Stormwater management strategy	New	Select stance	Part 1 Schedule 1		
	Stormwater network	Amended	Select stance	Part 1 Schedule 1		
	Stormwater treatment system	New	Select stance	Part 1 Schedule 1		
	Stocking rate	New	Select stance	Freshwater		
	Stock unit	New	Select stance	Freshwater		
	Unplanned greenfield development	New	Select stance	Part 1 Schedule 1		
	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)	New	Amend	Freshwater	Refers to outdated regulations	Refer to updated regulations - NES-CF
	Wastewater network catchment or sub-catchment	New	Select stance	Part 1 Schedule 1		
	Wet weather overflows	New	Select stance	Part 1 Schedule 1		
	Whaitua	Amended	Select stance	Part 1 Schedule 1		
	Winter Stocking rate	New	Select stance	Freshwater		
3 Objectives	Amendments to Chapter 3 - Objectives	Not applicable to Whaitua		Part 1 Schedule 1		
	Objective O2	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O5	Not applicable to Whaitua	Select stance	Freshwater		
	Objective O6	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O17	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O20	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O34	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O35	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O36	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O37	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O38	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	3.6 Water quality	Amended/Not applicable to Whaitua		Part 1 Schedule 1		
	Objective O18: Rivers, lakes, natural wetlands and coastal water are suitable for contact recreation and Māori customary use.	Amended	Select stance	Part 1 Schedule 1		
	Table 3.1 Primary contact recreation and Māori customary use objectives in freshwater bodies.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		

	Table 3.2 Secondary contact and Māori customary use recreation objectives in freshwater bodies.	Amended	Select stance	Part 1 Schedule 1		
	Table 3.3 Contact recreation and Māori customary use objectives in coastal water.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	3.7 Biodiversity, aquatic ecosystem health and mahinga kai	Amended/Not applicable to Whaitua		Part 1 Schedule 1		
	Objective O19: Biodiversity, aquatic ecosystem health and mahinga kai in fresh water bodies and the coastal marine area are safeguarded.	Amended	Select stance	Part 1 Schedule 1		
	Table 3.4 Rivers and Streams.	Not applicable to Whaitua	Amend	Part 1 Schedule 1	<i>Parameters in Table 3.4 for water quality are still relevant to the Whaitua and have not been carried over to the new target tables</i>	Retain the application of nuisance macrophytes, periphyton cover, toxicants, and mahinga kai targets to the new Whaitua chapters
	Table 3.5 Lakes.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Table 3.6 Groundwater.	Not applicable to Whaitua	Amend	Part 1 Schedule 1	<i>No replacement targets have been provided for the Whaitua</i>	Retain application of Table 3.6 to the Whaitua
	Table 3.7 Natural wetlands.	Amended	Amend	Part 1 Schedule 1	<i>No replacement targets have been provided for the Whaitua</i>	Retain application of Table 3.7 to the Whaitua
	Table 3.8 Coastal waters.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	3.8 Sites with significant values	Amended		Part 1 Schedule 1		
	Objective O25: Outstanding water bodies identified in Schedule A (outstanding water bodies) and their significant values are protected and restored.	Amended	Support	Part 1 Schedule 1	<i>Protects ecosystem and indigenous biodiversity health</i>	
	Objective O28: Ecosystems and habitats with significant indigenous biodiversity values are protected from the adverse effects of use and development, and where appropriate restored to a healthy functioning state including as defined by Tables 3.4, 3.5, 3.6, 3.7 and 3.8.	Amended	Support	Part 1 Schedule 1	Protects ecosystem and indigenous biodiversity health	
4 Policies		Not applicable to Whait / Not applicable to Whaitua Te Awarua-o-Porirua		Part 1 Schedule 1		
	Policy P65: National Policy Statement for Freshwater Management requirements for discharge consents.	Not applicable to Whaitua	Select stance	Freshwater		
	Policy P70: Minimising effects of rural land use activities.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P71: Managing the discharge of nutrients.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P72: Priority Catchments.	Not applicable to Whaitua	Select stance	Freshwater		
	Policy P73: Implementation of farm environment plans in priority catchments.	Not applicable to Whaitua	Select stance	Freshwater		
	Policy P74: Avoiding an increase in adverse effects of rural land use activities and associated diffuse discharges of contaminants.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P76: Consent duration for rural land use in priority catchments.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P77: Improving water quality for contact recreation and Māori customary use.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P79: Quality of point source discharges to rivers.	Not applicable to Whaitua	Select stance	Freshwater		
	Policy P82: Avoiding inappropriate discharges to water.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P83: Minimising adverse effects of stormwater discharges.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P84: Managing land use impacts on stormwater.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P85: Development of a stormwater management strategy for first-stage local authority and state highway network consents.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P86: Second-stage local authority and state highway network consents.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P87: Minimising wastewater and stormwater interactions.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P88: Assessing resource consents to discharge stormwater containing wastewater.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P118: Water takes at minimum flows and minimum water levels.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
	Policy P121: Core allocation for rivers.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
	4.6 Biodiversity, aquatic ecosystem health and mahinga kai.	Amended		Part 1 Schedule 1		
	Policy P30: Biodiversity, aquatic ecosystem health and mahinga kai.	Amended	Select stance	Part 1 Schedule 1		
	Policy P36: Restoring Wairarapa Moana	Amended	Select stance	Part 1 Schedule 1		
	4.7.3 Sites with significant indigenous biodiversity value.	Amended		Part 1 Schedule 1		
	Policy P45: Protecting trout habitat.	Amended	Select stance	Part 1 Schedule 1		
	4.9.1 Discharges to land and water.	Amended		Part 1 Schedule 1		
	Policy P78: Managing point source discharges for aquatic ecosystem health and mahinga kai.	Amended	Select stance	Part 1 Schedule 1		
5.1 Air quality rules	5.1.2 Outdoor burning.	Amended		Part 1 Schedule 1		
	Rule R1: Outdoor burning – permitted activity.	Amended	Select stance	Part 1 Schedule 1		

	Rule R3: Outdoor burning for firefighter training – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	5.1.4 Large scale combustion activities.	Amended		Part 1 Schedule 1		
	Rule R7: Natural gas and liquefied petroleum gas – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R8: Diesel or kerosene blends – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R9: Biogas – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R10: Untreated wood – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R11: Coal, light fuel oil, and petroleum distillates of higher viscosity – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R12: Emergency power generators – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	5.1.5 Chemical and metallurgical processes.	Amended		Part 1 Schedule 1		
	Rule R14: Spray coating within an enclosed space – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R15: Spray coating not within an enclosed space – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R16: Printing processes – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R17: Dry cleaning – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R18: Fume cupboards – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R19: Workplace ventilation – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R20: Mechanical processing of metals – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R21: Thermal metal spraying – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	5.1.7 Dust generating activities.	Amended		Part 1 Schedule 1		
	Rule R25: Abrasive blasting within an enclosed booth – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R26: Abrasive blasting outside an enclosed area – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R27: Handling of bulk solid materials – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R28: Cement storage – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	5.1.8 Food, animal or plant matter manufacturing and processing.	Amended		Part 1 Schedule 1		
	Rule R29: Alcoholic beverage production – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R30: Coffee roasting – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R31: Food, animal or plant matter manufacturing and processing – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	5.1.9 Fuel storage	Amended		Part 1 Schedule 1		
	Rule R33: Petroleum storage or transfer facilities – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	5.1.10 Mobile sources.	Amended		Part 1 Schedule 1		
	Rule R34: Mobile source emissions – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	5.1.11 Gas, water and wastewater processes.	Amended/New		Part 1 Schedule 1		
	Rule R35: Water and wastewater processes – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R35A: Gas processes – permitted activity.	New	Select stance	Part 1 Schedule 1		
	5.1.12 Drying and kiln processes.	Amended		Part 1 Schedule 1		
	Rule R36: Drying and heating of minerals – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	5.1.13 Discharge of agrichemicals.	Amended		Part 1 Schedule 1		
	General conditions for the discharge of agrichemicals.	Amended	Select stance	Part 1 Schedule 1		
	Rule R37: Handheld discharge of agrichemicals – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R38: Motorised and aerial discharge of agrichemicals – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R39: Agrichemicals not permitted – restricted discretionary activity.	Amended	Select stance	Part 1 Schedule 1		
	5.1.14 Fumigation.	Amended		Part 1 Schedule 1		
	Rule R40: Fumigation – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	5.1.15 All other discharges	Amended		Part 1 Schedule 1		
	Rule R42: All other discharges – discretionary activity.	Amended	Select stance	Part 1 Schedule 1		
	5.2 and 5.3 Discharges to land and water and land use rules	Not applicable to Whaitua		Part 1 Schedule 1		
	Rule R48: Stormwater from an individual property – permitted activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R49: Stormwater from new subdivision and development – permitted activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R50: Stormwater from new subdivision and development – restricted discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R51: Stormwater to land – permitted activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R52: Stormwater from a local authority or state highway network – controlled activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R53: Stormwater from a local authority or state highway network with a stormwater management strategy – restricted discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R54: Stormwater from a port or airport – restricted discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R55: All other stormwater – discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R56: Water races – discretionary activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R57: Existing pumped drainage schemes – permitted activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R58: All other pumped drainage schemes – discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		

	Rule R65: Wastewater discharges to coastal and fresh water – discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R66: Discharges of wastewater to fresh water – non-complying activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R68: Discharge of treated wastewater from a wastewater network – restricted discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R101: Earthworks – permitted activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R102: Construction of a new farm track – permitted activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R103: Construction of a new farm track – controlled activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R104: Vegetation clearance on erosion prone land – permitted activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R105: Vegetation clearance on erosion prone land in accordance with a Freshwater Farm Plan – permitted activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R106: Earthworks and vegetation clearance for renewable energy generation – restricted discretionary activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R107: Earthworks and vegetation clearance – discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R110: Use of rural land in priority catchments – permitted activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R111: Use of rural land in priority catchments – controlled activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R112: Use of rural land in priority catchments – discretionary activity.	Not applicable to Whaitua	Select stance	Freshwater		
	5.4.4 Uses of beds of lakes and rivers general conditions.	Amended		Part 1 Schedule 1		
	Beds of lakes and rivers general conditions.	Amended	Select stance	Part 1 Schedule 1		
	5.4.5 Uses of beds of lakes and rivers.	Amended		Freshwater		
	Rule R128: New structures – permitted activity.	Amended	Amend	Freshwater	<i>To give effect to Policies 7 and 9 NPSFM and Policy 30 NRP</i>	Ensure that activities avoid the loss of river extent and values and that the habitats of indigenous species are protected. Introduce TASs for habitat and natural form and character which activities must achieve.
	Rule R132: Minor sand and gravel extraction – permitted activity.	Amended	Select stance	Freshwater		
	Rule R133: Gravel extraction for flood protection purposes or erosion mitigation inside sites of significance – discretionary activity.	Amended	Amend	Freshwater	<i>To give effect to NPSFM</i>	Include Schedules A1 - A3 in Rule R133 so that activities inside a scheduled area require discretionary consent
	5.4.7 All other uses of the beds of lakes and rivers.	Amended		Part 1 Schedule 1		
	Rule R145: All other uses of river and lake beds – discretionary activity.	Amended	Select stance	Part 1 Schedule 1		
	5.4.8 Damming and diverting water	New		Freshwater		
	Rule R151A: Ongoing diversion of a river – permitted activity.	New	Select stance	Freshwater		
	5.5 Water allocation rules	Not applicable to Te Awarua-o-Porirua Whaitua		Freshwater		
	Rule R152: Take and use of water – permitted activity.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
	Rule R153: Farm dairy washdown and milk-cooling water – permitted activity.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
	Rule R154: Water races – permitted activity.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
	Rule R157: Take and use of water – controlled activity.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
	Rule R158: All other take and use – discretionary activity.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
6 Other methods	6.16 Freshwater Action Plan programme	New		Freshwater		
	Method M36: Freshwater Action Plan programme.	New	Support	Freshwater	<i>Gives effect to NPSFM</i>	
	Method M37: Freshwater Action Plan for the Parangarahu Lakes.	New	Support	Freshwater	<i>Gives effect to NPSFM</i>	
	Method M38: Freshwater Action Plan for the Rangitui catchment.	New	Support	Freshwater	<i>Gives effect to NPSFM</i>	
	Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Support	Part 1 Schedule 1	<i>Gives effect to NPSFM</i>	
	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
	Method M41: Identifying and responding to degradation in freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Support	Freshwater	<i>Gives effect to NPSFM</i>	
	6.17 Small farm property registration	New		Freshwater		
	Method M42: Small farm property registration within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
	6.16 Supporting improved water quality outcomes.	New		Part 1 Schedule 1		
	Method M43: Supporting the health of urban waterbodies.	New	Select stance	Part 1 Schedule 1		
	Method M44: Supporting the health of rural waterbodies.	New	Amend	Part 1 Schedule 1	<i>To give effect to NPSFM</i>	Include reference to "wetlands" in the chapeau
	Method M45: Funding of wastewater and stormwater network upgrades	New	Support	Part 1 Schedule 1	<i>To give effect to NPSFM</i>	
8 Whaitua Te Whanganui-a-T	8.1 Objectives	New		Both		
	Objective WH.01: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.	New	Amend	Part 1 Schedule 1	<i>To give effect to NPSFM</i>	Delete "Note" so that the wai ora state has legal effect as part of the objective. Amend 2100 to 2050 to reflect the urgency of addressing freshwater issues and the biodiversity crisis.

	Objective WH.O2: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora.	New	Amend	Freshwater	<i>Consistency with and to give effect to NPSFM</i>	Include reference to natural form and character in the objective (under (a)) and refer to ecosystem health as it is more consistent with NPSFM. Amend 2040 to 2030 to reflect the urgency of addressing freshwater issues and the biodiversity crisis.
	Objective WH.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved to achieve the coastal water objectives set out in Table 8.1.	New	Amend	Part 1 Schedule 1	<i>To give effect to NPSFM</i>	Amend 2040 to 2030 to reflect the urgency of addressing freshwater issues and the biodiversity crisis.
	Table 8.1 Coastal water objectives.	New	Amend	Part 1 Schedule 1	<i>Key coastal water quality parameters are missing and more stringent timeframes are required</i>	Include a parameter for Turbidity (Unit: NTU; Statistic: Turbidity must be maintained at or below the current annual median or at or below pre-existing levels, whichever is lesser; Te Whanganui-a-Tara Harbour and estuaries, Makara Estuary, Wainuiomata Estuary: <6.9; Wai Tai: No discernible change) Add further parameters (for example lead, dissolved oxygen, temperature, pH, secchi depth, chlorophyll-a, total phosphorous, total nitrogen, nitrite-nitrate nitrogen, ammoniacal nitrogen, and faecal coliforms) to ensure narrative objectives in Table 3.8 of the Operative Plan are met. Amend Wai Tai unit for <i>Enterococci</i> : <200 <40 Add interim timeframes as per NPSFM 3.11.
	Objective WH.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status.	New	Amend	Part 1 Schedule 1	<i>Does not align with NPSFM, which is "threatened species"</i>	Amend to "threatened species"
	Objective WH.O5: By 2040 the health and wellbeing of the Parangarahu Lakes and associated natural wetlands are on a trajectory of improvement towards wai ora.	New	Amend	Freshwater	<i>To give effect to NPSFM</i>	Amend 2040 to 2030 to reflect the urgency of addressing freshwater issues and the biodiversity crisis
	Table 8.2 Target attribute states for lakes.	New	Amend	Freshwater		Include the attributes from Table 3.5 which previously applied but have not been carried over - including sediment, mahinga kai, fish, and macroalgae Amend the timeframe for achievement of states to 2030
	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	New	Support	Freshwater	<i>Gives effect to NPSFM</i>	
	Objective WH.O7: The physical integrity of aquifers is protected so that confined aquifer pressures are maintained.	New	Support	Freshwater	<i>Gives effect to NPSFM</i>	
	Objective WH.O8: Primary contact sites within Te Awa Kairangi/Hutt River, Pākura River, Akatarawa River and Wainuiomata River are suitable for primary contact.	New	Amend	Freshwater	<i>To give effect to NPSFM</i>	Amend 2040 to 2030 to reflect the urgency of addressing freshwater issues and the biodiversity crisis
	Table 8.3 Primary contact site objectives in rivers.	New	Select stance	Freshwater		
	Objective WH.O9: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	New	Amend	Freshwater	<i>To give effect to NPSFM</i>	Amend chapeau to include natural form and character
	Table 8.4: Target attribute states for rivers.	New	Amend	Freshwater	<i>It is not clear what river types are covered by each part FMU. Periphyton targets should be no higher than 120 mg to protect ecosystem health. Nitrate toxicity is ecologically irrelevant and the NPSFM bottom line is too high. More ecologically sounds values are available for DIN targets. It is unclear how fish community health will be determined and how it is different to IBI. MCI targets should be higher to protect ecosystem health. The table is missing attributes</i>	State river type and class for each of the part FMUs Set a minimum target state for periphyton biomass for all part FMUs at NPSFM band of 120 mg chl-a (and retain higher targets where included). Amend nitrate toxicity target to be NPSFM 'A' band for all part FMUs. Retain DIN target states where they are set below 0.3 mg/L. Amend others to be 0.3 mg/L (median) for good rivers (type 1 and 4) 0.6 for medium rivers (type 2 and 3) and 1.0 for poor rivers (type 5 & 6). Minimum DIN target should be no higher than 1.0. Clearly define what fish community health as determined by experts actually means Set higher targets for MCI attributes Retain 'nuisance macrophytes', 'periphyton cover', mahinga kai, and toxicants attributes from table 3.4 Retain groundwater attributes from table 3.6 Amend table (or add another table) to include target attribute states for habitat and natural form and character using the Habitat Quality / Natural Character Index. Minimum targets should set out a target of maintenance of habitat quality / natural character (e.g., minimum ratio of current:reference condition of 0.85). Amend target timeframe to 2030 and outline date from which maintenance will be continued (as per NPSFM 3.11). If date remains 2040, set out interim states at no longer than 10-year intervals.
	8.2 Policies	New		Both		
	Policy WH.P1: Improvement of aquatic ecosystem health.	New	Amend	Part 1 Schedule 1	<i>To give effect to NPSFM</i>	Amend (b) to read "restoring habitats and natural form and character"
	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	New	Amend	Part 1 Schedule 1	<i>To give effect to NPSFM</i>	Amend (f) to require avoidance of significant adverse effects from earthworks, forestry and vegetation clearance activities. Support removal of stock from waterbodies AND the coastal environment.
	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	New	Support	Freshwater	<i>Gives effect to NPSFM</i>	
	Policy WH.P4: Achievement of the visual clarity target attribute states.	New	Support	Freshwater	<i>Gives effect to NPSFM</i>	
	Table 8.5: Sediment load reductions required to achieve the visual clarity target attribute states.	New	Amend	Freshwater	<i>To give effect to NPSFM</i>	Amend 2040 to 2030 to reflect the urgency of addressing freshwater issues and the biodiversity crisis
	Policy WH.P5: Localised adverse effects of point source discharge.	New	Select stance	Part 1 Schedule 1		

	Policy WH.P6: Cumulative adverse effects of point source discharges.	New	Support	Part 1 Schedule 1	<i>Gives effect to NPSFM</i>	
	Policy WH.P7: Discharges to groundwater.	New	Select stance	Freshwater		
	Policy WH.P8: Avoiding discharges of specific products and waste.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P10: Managing adverse effects of stormwater discharges.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P12: Managing stormwater from a port or airport.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P17: General wastewater policy to achieve target attribute states and coastal objectives.	New	Support	Part 1 Schedule 1	<i>Gives effect to NPSFM</i>	
	Policy WH.P18: Progressing works to meet Escherichia coli target attribute states.	New	Support	Freshwater	<i>Gives effect to NPSFM</i>	
	Policy WH.P19: Managing wastewater network catchment discharges.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P20: Managing existing wastewater treatment plant discharges.	New	Select stance	Part 1 Schedule 1		
	8.2.4 Rural land use and earthworks	New		Both		
	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	New	Support	Freshwater	<i>Gives effect to NPSFM</i>	
	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	New	Amend	Freshwater	<i>To give effect to NPSFM</i>	Enable controls on smaller rural properties even if they are not intensively farmed
	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	New	Support	Freshwater	<i>Gives effect to NPSFM</i>	
	Policy WH.P24: Phasing of farm environment plans.	New	Amend	Part 1 Schedule 1	<i>To give effect to NPSFM</i>	Amend to include deposited sediment
	Policy WH.P25: Managing rural land use change.	New	Select stance	Freshwater		
	Policy WH.P26: Managing livestock access to small rivers.	New	Support	Freshwater	<i>To give effect to NPSFM</i>	
	Policy WH.P27: Promoting stream shading.	New	Amend	Freshwater	<i>To give effect to NPSFM</i>	Consider requiring progressive shading, not just promoting
	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	New	Amend	Freshwater	<i>To give effect to NPSFM</i>	Require setbacks, alternative harvesting methods that do not clear fell trees and spatially and/or temporally limit harvesting
	Policy WH.P29: Management of earthworks.	New	Amend	Part 1 Schedule 1	<i>To give effect to NPSFM</i>	Require setbacks
	Policy WH.P30: Discharge standard for earthworks.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P31: Winter shut down of earthworks.	New	Support	Part 1 Schedule 1	<i>To give effect to NPSFM</i>	
	8.2.5 Water allocation	New		Freshwater		
	Policy WH.P32: Minimum flows and minimum water levels in Whaitua Te Whanganui-a-Tara.	New	Support	Freshwater	<i>90% of MALF is consistent with proposed NES on Ecological Flows and Water Levels</i>	
	Policy WH.P33: Core allocation in Whaitua Te Whanganui-a-Tara.	New	Select stance	Freshwater	<i>To give effect to NPSFM</i>	
	8.3 Rules	New		Both		
	8.3.1 Discharges of contaminants	New		Part 1 Schedule 1		
	Rule WH.R1: Point source discharges of specific contaminants – prohibited activity.	New	Support	Part 1 Schedule 1	<i>To give effect to NPSFM</i>	
	8.3.2 Stormwater	New		Both		
	Rule WH.R2: Stormwater to land – permitted activity.	New	Select stance	Freshwater		
	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water – permitted activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R6: Stormwater from new greenfield impervious surfaces – controlled activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas – controlled activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R8: Stormwater from a port or airport – restricted discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R9: Stormwater from a local authority or state highway network–restricted discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R10: Stormwater from new state highways– discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces – discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R12: All other stormwater discharges – non-complying activity.	New	Select stance	Part 1 Schedule 1		

	Rule WH.R13: Stormwater from new unplanned greenfield development – prohibited activity.	New	Select stance	Part 1 Schedule 1		
	8.3.3 Wastewater	New		Part 1 Schedule 1		
	Rule WH.R14: Wastewater network catchment discharges – restricted discretionary activity.	New	Support	Part 1 Schedule 1	Gives effect to NPSFM	
	Rule WH.R15: Existing wastewater discharges from a treatment plant – discretionary activity.	New	Support	Part 1 Schedule 1	Gives effect to NPSFM	
	Rule WH.R16: All other discharges of wastewater – non-complying activity.	New	Support	Part 1 Schedule 1	Gives effect to NPSFM	
	8.3.4 Land uses	New		Freshwater		
	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	New	Amend	Freshwater	To give effect to NPSFM and comply with RMA	Make a controlled activity or alternatively amend permitted activity standards to avoid sedimentation of receiving waterbodies and the coastal marine area.
	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	New	Amend	Freshwater	To give effect to NPSFM and comply with RMA	Make a discretionary or restricted discretionary activity to ensure the avoidance of adverse sedimentation effects associated with the clearance.
	Rule WH.R19: Vegetation clearance – discretionary activity.	New	Amend	Freshwater	To give effect to NPSFM and comply with RMA	"Vegetation clearance" is defined to not include commercial forest trees. Need to clarify whether Rules WH.R17 - 20 apply to commercial forestry activities. The "Note" in Rule WH R19 says that the rules prevail over the NES-PF but those rules relate to commercial harvesting. EDS supports the NRP imposing greater stringency than the NES-PF and NES-CF
	Rule WH.R20: Plantation forestry – controlled activity.	New	Amend	Freshwater	To give effect to NPSFM and comply with RMA	Make a discretionary or restricted discretionary activity
	Rule WH.R21: Plantation forestry – discretionary activity.	New	Amend	Freshwater	To give effect to NPSFM and comply with RMA	Amend as consequence of changes to Rule WH.20
	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.	New	Support	Freshwater	Gives effect to NPSFM	
	8.3.5 Earthworks	New		Both		
	Rule WH.R23: Earthworks – permitted activity.	New	Amend	Freshwater	To give effect to NPSFM and comply with RMA	Greater setback from waterbodies and coastal marine area required. Also need to clarify interaction of rule with NES-PF/CF
	Rule WH.R24: Earthworks – restricted discretionary activity.	New	Amend	Part 1 Schedule 1	To give effect to NPSFM and comply with RMA	Make a discretionary activity. Also need to clarify interaction of rule with NES-PF/CF
	Rule WH.R25: Earthworks – non-complying activity.	New	Support	Part 1 Schedule 1	Gives effect to NPSFM	
	8.3.6 Nutrients and sediment from pastoral farming	New		Freshwater		
	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares – permitted activity.	New	Amend	Freshwater	To give effect to NPSFM and comply with RMA	Amend list to include "annual nitrogen fertiliser use, the annual stocking rate, and the winter stocking rate is provided to Wellington Regional Council annually"
	Rule WH.R27: Farming activities on 20 hectares or more of land – permitted activity.	New	Select stance	Freshwater		
	Table 8.6: Phase-in of farm environment plans for part Freshwater Management Units.	New	Support	Freshwater	Gives effect to NPSFM	
	Rule WH.R28: Livestock access to a small river – permitted activity.	New	Support	Freshwater	Gives effect to NPSFM	
	Rule WH.R29: Livestock access to a small river – discretionary activity.	New	Support	Freshwater	Gives effect to NPSFM	
	Rule WH.R30: The use of land for farming activities – discretionary activity.	New	Support	Freshwater	Gives effect to NPSFM	
	Rule WH.R31: Change of rural land use – discretionary activity.	New	Support	Freshwater	Gives effect to NPSFM	
	Rule WH.R32: Farming activities – non-complying activity.	New	Support	Freshwater	Gives effect to NPSFM	
	8.3.7 Take and use of water	New		Freshwater		
	Rule WH.R33: Take and use of water in the Whaitua Te Whanganui-a-Tara – restricted discretionary activity.	New	Select stance	Freshwater		
	Rule WH.R34: Take and use of water in the Whaitua Te Whanganui-a-Tara – discretionary activity.	Amended	Select stance	Freshwater		
	Rule WH.R35: Take and use of water from outstanding rivers or lakes – non-complying activity.	Amended	Support	Freshwater	Gives effect to NPSFM	
	Rule WH.R36: Take and use of water exceeding minimum flows or core allocation – prohibited activity.	Amended	Support	Freshwater	Gives effect to NPSFM	
	Table 8.7: Minimum flows for rivers in the Whaitua Te Whanganui-a-Tara.	Amended	Select stance	Freshwater		
	Table 8.8: Surface water allocation amounts for rivers and Category A groundwater and Category B groundwater in the Te Awa Kairangi/Hutt River, Wainuiomata River and Ōrongorongo River catchments.	Amended	Select stance	Freshwater		
	Table 8.9: Groundwater allocation amounts for Category B groundwater and Category C groundwater in the Whaitua Te Whanganui-a-Tara.	Amended	Select stance	Freshwater		
	Figure 8.1: Te Awa Kairangi / Hutt River and Upper Hutt groundwater in Tables 8.8 and 8.9.	Amended	Select stance	Freshwater		
	Figure 8.2: Te Awa Kairangi / Hutt River and Lower Hutt groundwater in Tables 8.8 and 8.9.	Amended	Select stance	Freshwater		
Chapter 9 Te Awarua-o-Porirua Whaitua	9.1 Objectives	New		Both		
	Objective P.O1: The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100.	New	Amend	Part 1 Schedule 1	To give effect to NPSFM	Delete "Note" so that the wai ora state has legal effect as part of the objective. Amend 2100 to 2050 to reflect the urgency of addressing freshwater issues and the biodiversity crisis.

	Objective P.O2: Te Awarua-o-Porirua's groundwater, rivers, lakes and natural wetlands, and their margins are on a trajectory of measurable improvement towards wai ora.	New	Amend	Freshwater	Consistency with and to give effect to NPSFM	Include reference to natural form and character in the objective (under (a)) and refer to ecosystem health as it is more consistent with NPSFM. Amend 2040 to 2030 to reflect the urgency of addressing freshwater issues and the biodiversity crisis.
	Objective P.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Pāuatahanui Inlet, Onepoto Arm and the open coastal areas of Te Awarua-o-Porirua is maintained or improved to achieve the coastal water objectives set out in Table 9.1.	New	Amend	Part 1 Schedule 1	To give effect to NPSFM	Amend 2040 to 2030 to reflect the urgency of addressing freshwater issues and the biodiversity crisis.
	Table 9.1: Coastal water objectives.	New	Amend	Part 1 Schedule 1	Amend to include further parameters and more stringent timeframes	Include a parameter for Turbidity (Unit: NTU; Statistic: Turbidity must be maintained at or below the current annual median or at or below pre-existing levels, whichever is lesser; Onepoto Arm: <10.8, Pauatahanui Inlet: <6.9; Open Coast: No discernible change). Add further parameters (for lead, dissolved oxygen, temperature, pH, secchi depth, chlorophyll-a, total phosphorous, total nitrogen, nitrite-nitrate nitrogen, ammoniacal nitrogen, and faecal coliforms) to ensure narrative objectives in Table 3.8 of the Operative Plan are met. Amend Open Coast unit for Enterococci: <200 <40 Amend timeframe to 2030 or provide interim targets as per NPSFM 3.11 requirement (with this being a critical receiving environment).
	Objective P.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased, and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status.	New	Select stance	Part 1 Schedule 1		
	Objective P.O5: Groundwater flows and levels, and water quality, are maintained.	New	Select stance	Freshwater		
	Objective P.O6: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	New	Select stance	Freshwater		
	Table 9.2: Target attribute states for rivers.	New	Amend	Freshwater	<i>It is not clear what river types are covered by each part FMU. Periphyton targets should be no higher than 120 mg to protect ecosystem health. Nitrate toxicity is ecologically irrelevant and the NPSFM bottom line is too high. More ecologically sounds values are available for DIN targets. It is unclear how fish community health will be determined and how it is different to IBI. MCI targets should be higher to protect ecosystem health. The table is missing attributes</i>	State river type and class for each of the part FMUs Set a minimum target state for periphyton biomass for all part FMUs at NPSFM band of 120 mg chl-a (and retain higher targets where included). Amend nitrate toxicity target to be NPSFM 'A' band for all part FMUs. Retain DIN target states where they are set below 0.3 mg/L. Amend others to be 0.3 mg/L (median) for good rivers (type 1 and 4) 0.6 for medium rivers (type 2 and 3) and 1.0 for poor rivers (type 5 & 6). Minimum DIN target should be no higher than 1.0. Clearly define what fish community health as determined by experts actually means Set higher targets for MCI attributes Retain 'nuisance macrophytes', 'periphyton cover', mahinga kai, and toxicants attributes from table 3.4 Retain groundwater attributes from table 3.6 Amend table (or add another table) to include target attribute states for habitat and natural form and character using the Habitat Quality / Natural Character Index. Minimum targets should set out a target of maintenance of habitat quality / natural character (e.g., minimum ratio of current:reference condition of 0.85). Amend target timeframe to 2030 and outline date from which maintenance will be continued (as per NPSFM 3.11). If date remains 2040, set out interim states at no longer than 10-year intervals.
	9.2 Policies	New		Both		
	9.2.1 Ecosystem health and water quality	New		Both		
	Policy P.P1: Improvement of aquatic ecosystem health.	New	Amend	Part 1 Schedule 1	To give effect to NPSFM	Amend (b) to read "restoring habitats and natural form and character"
	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	New	Amend	Part 1 Schedule 1	To give effect to NPSFM	Amend (f) to require avoidance of significant adverse effects from earthworks, forestry and vegetation clearance activities
	Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	New	Select stance	Freshwater		
	Policy P.P4: Contaminant load reductions.	New	Select stance	Part 1 Schedule 1		
	Table 9.3: Harbour arm catchment contaminant load reductions.	New	Amend	Part 1 Schedule 1	To give effect to NPSFM	Amend 2040 to 2030 to reflect the urgency of addressing freshwater issues and the biodiversity crisis
	Table 9.4: Part Freshwater Management Unit sediment load reductions required to achieve the visual clarity target attribute state.	New	Select stance	Part 1 Schedule 1		
	8.2.1 Discharges to water	New		Both		
	Policy P.P5: Localised adverse effects of point source discharges.	New	Select stance	Part 1 Schedule 1		
	Policy P.P6: Point source discharges.	New	Support	Part 1 Schedule 1	Gives effect to NPSFM	
	Policy P.P7 Discharges to groundwater.	New	Select stance	Freshwater		
	Policy P.P8 Avoiding discharges of specific products and waste.	New	Select stance	Part 1 Schedule 1		
	9.2.2 Stormwater	New		Part 1 Schedule 1		
	Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	New	Select stance	Part 1 Schedule 1		
	Policy P.P10: Managing adverse effects of stormwater discharges.	New	Select stance	Part 1 Schedule 1		
	Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises.	New	Select stance	Part 1 Schedule 1		
	Policy P.P12: Managing stormwater network discharges through a Stormwater Management Strategy.	New	Select stance	Part 1 Schedule 1		

	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	New	Select stance	Part 1 Schedule 1		
	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	New	Select stance	Part 1 Schedule 1		
	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	New	Select stance	Part 1 Schedule 1		
	9.2.3 Wastewater	New		Both		
	Policy P.P16: General wastewater policy to achieve target attribute states and coastal water objectives.	New	Support	Part 1 Schedule 1	Gives effect to NPSFM	
	Policy P.P17: Progressing works to meet Escherichia coli target attribute states.	New	Support	Freshwater	Gives effect to NPSFM	
	Policy P.P18: Managing wastewater network catchment discharges.	New	Select stance	Part 1 Schedule 1		
	Policy P.P19: Managing existing wastewater treatment plant discharges.	New	Select stance	Part 1 Schedule 1		
	9.2.4 Rural Land Uses and Earthworks	New		Both		
	Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	New	Support	Freshwater	Gives effect to NPSFM	
	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	New	Amend	Freshwater	To give effect to NPSFM	Enable controls on smaller rural properties even if they are not intensively farmed
	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	New	Support	Freshwater	Gives effect to NPSFM	
	Policy P.P23: Phasing of farm environment plans.	New	Amend	Freshwater	To give effect to NPSFM	Amend to include deposited sediment
	Policy P.P24: Managing rural land use change.	New	Select stance	Freshwater		
	Policy P.P25: Promoting stream shading.	New	Amend	Freshwater	To give effect to NPSFM	Consider requiring progressive shading, not just promoting
	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	New	Amend	Freshwater	To give effect to NPSFM	Require setbacks, alternative harvesting methods that do not clear fell trees and spatially and/or temporally limit harvesting
	Policy P.P27: Management of earthworks sites.	New	Amend	Part 1 Schedule 1	To give effect to NPSFM	Require setbacks
	Policy P.P28: Discharge standard for earthworks sites.	New	Select stance	Part 1 Schedule 1		
	Policy P.P29: Winter shut down of earthworks.	New	Support	Part 1 Schedule 1	Gives effect to NPSFM	
	9.2.5 Water allocation	Amended/New		Freshwater		
	Policy P.P30: Minimum flows and minimum water levels in Te Awarua-o-Porirua Whaitua.	Amended	Support	Freshwater	90% of MALF is consistent with proposed NES on Ecological Flows and Water Levels	
	Policy P.P31: Water takes at minimum flows and minimum water levels.	New	Select stance	Freshwater		
	Policy P.P32: Allocation in the Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
	9.3 Rules	New		Both		
	9.3.1 Discharges of contaminants	New		Both		
	Rule P.R1: Point source discharges of specific contaminants – prohibited activity.	New	Support	Part 1 Schedule 1	To give effect to NPSFM	
	Rule P.R2: Stormwater to land – permitted activity.	New	Select stance	Freshwater		
	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water – permitted activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R6: Stormwater from new greenfield impervious surfaces – controlled activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas– controlled activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R8: Stormwater from a local authority or state highway network–restricted discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R9: Stormwater from new state highways– discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R10: Stormwater from new and redeveloped impervious surfaces– discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R11: All other stormwater discharges – non-complying activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R12 – Stormwater discharges from new unplanned greenfield development – prohibited activity.	New	Select stance	Part 1 Schedule 1		
	9.3.3 Wastewater	New		Part 1 Schedule 1		
	Rule P.R13: Wastewater network catchment discharges to water – restricted discretionary activity.	New	Support	Part 1 Schedule 1	Gives effect to NPSFM	
	Rule P.R14: Existing wastewater discharges from a treatment plant to coastal and freshwater – discretionary activity.	New	Support	Part 1 Schedule 1	Gives effect to NPSFM	
	Rule P.R15: All other discharges of wastewater – non-complying activity.	New	Support	Part 1 Schedule 1	Gives effect to NPSFM	
	9.3.4 Land uses	New		Freshwater		
	Rule P.R16: Vegetation clearance on highest erosion risk land– permitted activity.	New	Amend	Freshwater	To give effect to NPSFM and comply with RMA	Make a controlled activity or alternatively amend permitted activity standards to avoid sedimentation of receiving waterbodies and the coastal marine area.
	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.	New	Amend	Freshwater	To give effect to NPSFM and comply with RMA	Make a discretionary or restricted discretionary activity to ensure the avoidance of adverse sedimentation effects associated with the clearance.

	Rule P.R18: Vegetation clearance – discretionary activity.	New	Amend	Freshwater	To give effect to NPSFM and comply with RMA	"Vegetation clearance" is defined to not include commercial forest trees. Need to clarify whether Rules WH.R17 - 20 apply to commercial forestry activities. The "Note" in Rule WH R19 says that the rules prevail over the NES-PF but those rules relate to commercial harvesting. EDS supports the NRP imposing greater stringency than the NES-PF and NES-CF
	Rule P.R19: Plantation forestry – controlled activity.	New	Amend	Freshwater	To give effect to NPSFM and comply with RMA	Make a discretionary or restricted discretionary activity
	Rule P.R20: Plantation forestry – discretionary activity.	New	Amend	Freshwater	To give effect to NPSFM and comply with RMA	Amend as consequence of changes to Rule WH.20
	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.	New	Support	Freshwater	Gives effect to NPSFM	
	9.3.5 Earthworks	New		Both		
	Rule P.R22: Earthworks – permitted activity.	New	Amend	Freshwater	To give effect to NPSFM and comply with RMA	Greater setback from waterbodies and coastal marine area required. Also need to clarify interaction of rule with NES-PF/CF
	Rule P.R23: Earthworks – restricted discretionary activity.	New	Amend	Part 1 Schedule 1	To give effect to NPSFM and comply with RMA	Make a discretionary activity. Also need to clarify interaction of rule with NES-PF/CF
	Rule P.R24: Earthworks – non-complying activity.	New	Support	Part 1 Schedule 1	Gives effect to NPSFM	
	9.3.6 Nutrients and sediment from pastoral farming	New		Freshwater		
	Rule P.R25: Farming activities on properties of between 4 hectares and 20 hectares – permitted activity.	New	Amend	Freshwater	To give effect to NPSFM and comply with RMA	Amend list to include "annual nitrogen fertiliser use, the annual stocking rate, and the winter stocking rate is provided to Wellington Regional Council annually"
	Rule P.R26: Farming activities on 20 hectares or more of land – permitted activity.	New	Select stance	Freshwater		
	Table 9.5: Phase in of farm environment plans for Part Freshwater Management Units.	New	Support	Freshwater	Gives effect to NPSFM	
	Rule P.R27: The use of land for farming activities – discretionary activity.	New	Support	Freshwater	Gives effect to NPSFM	
	Rule P.R28: Change of rural land use – discretionary activity.	New	Support	Freshwater	Gives effect to NPSFM	
	Rule P.R29: Farming activities – non-complying activity.	New	Support	Freshwater	Gives effect to NPSFM	
	9.3.7 Take and use of water	New		Freshwater		
	Rule P.R30: Take and use of water – permitted activity.	New	Amend	Freshwater		Add an additional clause: (x) the rate of take from a river does not exceed whichever is the lesser of: a) 10% of the instantaneous flow at the point and time of take, or b) An absolute limit of 2.5 l/s.
	Rule P.R31: Take and use of water – restricted discretionary activity.	New	Select stance	Freshwater		
	Rule P.R32: Take and use of water – discretionary activity.	New	Select stance	Freshwater		
	Rule P.R33: Taking and use of water that exceeds minimum flows or allocation amounts – prohibited activity.	New	Support	Freshwater	Gives effect to NPSFM	
	Table 9.6: Minimum flows for Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
	Table 9.7: Surface water allocation amounts for Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
	12 Schedules	Amended/New		Both		
	Schedule A: Outstanding water bodies	New	Amend	Part 1 Schedule 1	Outstanding water bodies need to be listed and mapped.	List and map outstanding water bodies in the area that are streams/ivers/wetlands, including Te Awakairangi, the Akatarawa River, and the Pakuratahi River.
	Schedule A2: Lakes with outstanding indigenous ecosystem values.	New	Amend	Part 1 Schedule 1	Further detail is required to ensure values can be protected	List Indigenous fish diversity as a value of Lake Wairarapa (Wairarapa Moana). Note threatened fish species known to be present for each lake.
	Schedule F: Ecosystems and habitats with significant indigenous biodiversity values.	Amended	Amend	Part 1 Schedule 1	Additional detail coming from DOC report on habitat requirements of native fish	Consider including additional detail in soon-to-be published DOC literature review of habitat requirements of native fish species
	Schedule F1: Rivers and lakes with significant indigenous ecosystems.	Amended	Support	Part 1 Schedule 1	Gives effect to NPSFM and complies with RMA	
	Schedule F2a: Significant habitats for indigenous birds in rivers.	Amended	Support	Part 1 Schedule 1	Gives effect to NPSFM and complies with RMA	
	Schedule F2b: Significant habitats for indigenous birds in lakes.	Amended	Support	Part 1 Schedule 1	Gives effect to NPSFM and complies with RMA	
	Schedule F2c: Significant habitats for indigenous birds in the coastal marine area.	Amended	Support	Part 1 Schedule 1	Gives effect to NPSFM and complies with RMA	
	Schedule F4: Sites with significant indigenous biodiversity values in the coastal marine area.	Amended	Support	Part 1 Schedule 1	Gives effect to NPSFM and complies with RMA	
	Schedule F5: Habitats with significant indigenous biodiversity values in the coastal marine area.	Amended	Support	Part 1 Schedule 1	Gives effect to NPSFM and complies with RMA	
	Schedule 27: Freshwater Action Plan requirements.	New	Support	Part 1 Schedule 1	Gives effect to NPSFM	
	A Freshwater Action Plans	New	Support	Freshwater	Gives effect to NPSFM	
	A1 Purpose	New	Support	Freshwater	Gives effect to NPSFM	

	A2 Freshwater Action Plans required in Whaitua Te Whanganui-a-Tara.	New	Amend	Freshwater	<i>Action plans are needed which address river/stream habitat and natural form and function to ensure this does not continue to degrade, and to meet council responsibilities under NPSFM Policies 7 and 9, and NPSFM requirements to manage all 5 components of ecosystem health and natural form and function. M39 also states action plans will be prepared for nationally threatened freshwater species, and states habitat</i>	Include "Habitat and natural form and character" under "Attributes for which Freshwater Action Plan will be prepared" for all part FMUs which are rivers / streams. That is, Ōrongorongo, Te Awa Kairangi and Wainuiomata small forested and Te Awa Kairangi forested mainstems Te Awa Kairangi lower mainstem Te Awa Kairangi rural streams and rural mainstems Te Awa Kairangi urban streams Waiwhetū Stream Wainuiomata urban streams Wainuiomata rural streams Parangarahu catchment streams and South-west coast rural streams Korokoro Stream Kaiwharawhara Stream Wellington urban Pouewe Takapū Taupō Te Rio o Porirua and Rangituihi Wai-O-Hata
	A3 Freshwater Action Plans required in Te Awarua-o-Porirua Whaitua.	New	Amend	Freshwater	<i>Action plans are needed which address river/stream habitat and natural form and function to ensure this does not continue to degrade, and to meet council responsibilities under NPSFM Policies 7 and 9, and NPSFM requirements to manage all 5 components of ecosystem health and natural form and function. M39 also states action plans will be prepared for nationally threatened freshwater species, and states habitat</i>	Include "Habitat and natural form and character" under "Attributes for which Freshwater Action Plan will be prepared" for all part FMUs which are rivers / streams. That is, Ōrongorongo, Te Awa Kairangi and Wainuiomata small forested and Te Awa Kairangi forested mainstems Te Awa Kairangi lower mainstem Te Awa Kairangi rural streams and rural mainstems Te Awa Kairangi urban streams Waiwhetū Stream Wainuiomata urban streams Wainuiomata rural streams Parangarahu catchment streams and South-west coast rural streams Korokoro Stream Kaiwharawhara Stream Wellington urban Pouewe Takapū Taupō Te Rio o Porirua and Rangituihi Wai-O-Hata
	B Freshwater Action Plan requirements.	New	Support	Freshwater	<i>Gives effect to NPSFM</i>	
	B1. Principles.	New	Support	Freshwater	<i>Gives effect to NPSFM</i>	
	B2. General Content.	New	Support	Freshwater	<i>Gives effect to NPSFM</i>	
	B3 Necessary actions.	New	Amend	Freshwater	<i>Additional wording is required to ensure natural form and character and habitat values are protected and maintained, and action is taken</i>	Insert "For the habitat and natural form and character attributes: (a) undertake a program to assess the state of habitat and natural form and character across the region, and (i) to monitor changes in habitat and natural form and character, (ii) to communicate changes through regular state of the environment reporting (b) review river management and flood protection plans to ensure habitat and natural form and character is maintained or improved through management actions (c) investigate options to strengthen consent conditions on activities which may affect habitat and natural form and character"
	C. Freshwater Action Plans in Whaitua Te Whanganui-a-Tara	New	Support	Freshwater	<i>Gives effect to NPSFM</i>	
	D Freshwater Action Plans in Te Awarua-o-Porirua Whaitua	New	Support	Freshwater	<i>Gives effect to NPSFM</i>	
	Schedule 28: Stormwater Contaminant Treatment.	New	Support	Part 1 Schedule 1	<i>Gives effect to NPSFM</i>	
	Table 1: Target load Reductions for Copper and Zinc	New	Select stance	Part 1 Schedule 1		
	Table 2: Additional Devices and Specified Load Reductions for Copper and Zinc	New	Select stance	Part 1 Schedule 1		
	Schedule 29: Stormwater Impact Assessments.	New	Select stance	Part 1 Schedule 1		

	Schedule 30: Financial Contributions.	New	Oppose	Part 1 Schedule 1	<i>The methodology proposed in Schedule 30 does not follow the effects management hierarchy and may ultimately facilitate adverse effects on aquatic species, the further deterioration of water quality and ecosystem health - contrary to RMA s 107(1), the NZCPS, and the NPSFM.</i>	Delete Schedule 30.
	A Context	New	Select stance	Part 1 Schedule 1		
	B Purpose	New	Select stance	Part 1 Schedule 1		
	C Definition of an Equivalent Household Unit	New	Select stance	Part 1 Schedule 1		
	D Calculation of level of contribution	New	Select stance	Part 1 Schedule 1		
	Table D1. Financial contribution calculations for residential greenfield development	New	Select stance	Part 1 Schedule 1		
	Tale D2. Financial contribution calculations for non-residential greenfield development and new roads/state highways	New	Select stance	Part 1 Schedule 1		
	E Use	New	Select stance	Part 1 Schedule 1		
	Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	New	Select stance	Part 1 Schedule 1		
	Schedule 32: Wastewater Network Catchment Improvement Strategy.	New	Select stance	Part 1 Schedule 1		
	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	New	Support	Freshwater	<i>Gives effect to NPSFM</i>	
	A Purposes of the Erosion and Sediment Management Plan	New	Support	Freshwater	<i>Gives effect to NPSFM</i>	
	B Management objectives	New	Support	Freshwater	<i>Gives effect to NPSFM</i>	
	C Requirements of the Erosion and Sediment Management Plan	New	Support	Freshwater	<i>Gives effect to NPSFM</i>	
	C1 Contents of the Erosion and Sediment Management Plan	New	Support	Freshwater	<i>Gives effect to NPSFM</i>	
	D Amendment of Erosion and Sediment Management Plan	New	Oppose	Freshwater	<i>GWRC should have jurisdiction to approve changes to management plans to ensure they still meet requirements to adequately manage sediment risk</i>	
	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	New	Support	Freshwater	<i>Gives effect to NPSFM</i>	
	A Purpose of the Erosion and Sediment Management Plan	New	Select stance	Freshwater		
	B Management objectives	New	Select stance	Freshwater		
	C Requirements of the Erosion and Sediment Management Plan	New	Select stance	Freshwater		
	C1 Contents of the Erosion and Sediment Management Plan	New	Select stance	Freshwater		
	C2 Certification of the Erosion and Sediment Management Plan	New	Select stance	Freshwater		
	D Amendment of Erosion and Sediment Management Plan	New	Oppose	Freshwater	<i>GWRC should have jurisdiction to approve changes to management plans to ensure they still meet requirements to adequately manage sediment risk</i>	
	Schedule 35: Small farm registration.	New	Amend	Freshwater	<i>Provision of fertiliser information is critical to ensure council is aware of pressures on catchment and can set appropriate limits on resource use, and complements reporting of stocking rates</i>	Include requirement to report nitrogen fertiliser use
	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
	A Certification requirements under the Resource Management (Freshwater Farm Plans) Regulations 2023.	New	Select stance	Freshwater		
	B Management objectives.	New	Select stance	Freshwater		
	C Content of a farm environment plan.	New	Select stance	Freshwater		
	D Risk assessment and mitigation to address risk.	New	Select stance	Freshwater		
	Table D1 Sediment loss and transport risk factors	New	Select stance	Freshwater		
	E Erosion Risk Treatment Plan.	New	Select stance	Freshwater		

	F Small stream riparian programme.	New	Amend	Freshwater	<i>Setbacks are required to ensure (1) waterbodies are protected from contaminants and (2) to ensure flood flows do not wash away fencing</i>	Amend to outline setback distance as a requirement, and to require revegetation of margins (with council support)
13 Maps		New		Both		
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4).	New	Select stance	Part 1 Schedule 1		
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 1: (Kāpiti).	New	Select stance	Part 1 Schedule 1		
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 2: (Wellington Harbour).	New	Select stance	Part 1 Schedule 1		
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 2: Te Awarua-o-Porirua.	New	Select stance	Part 1 Schedule 1		
	Map 77: Habitats of nationally threatened freshwater species – Te Awarua-o-Porirua and Te Whanganui-a-Tara (Schedule F1).	New	Select stance	Part 1 Schedule 1		
	Map 78: Part freshwater management units and target attribute state sites (rivers) – Te Awarua-o-Porirua.	New	Select stance	Freshwater		
	Map 79: Part freshwater management units and target attribute state sites (rivers) – Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	Map 80: Part freshwater management units and target attribute state sites (lakes) – Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	Map 81: Rivers and catchment management units for water takes – Te Awarua-o-Porirua.	New	Select stance	Freshwater		
	Map 82: Coastal water management units – Te Awarua-o-Porirua.	New	Select stance	Part 1 Schedule 1		
	Map 83: Coastal water management units – Te Whanganui-a-Tara.	New	Select stance	Part 1 Schedule 1		
	Map 84: Harbour arm catchments – Te Awarua-o-Porirua.	New	Select stance	Part 1 Schedule 1		
	Map 85: Primary contact sites – Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	Map 86: Unplanned greenfield areas – Porirua City Council.	New	Select stance	Part 1 Schedule 1		
	Map 87: Unplanned greenfield areas – Wellington City Council.	New	Select stance	Part 1 Schedule 1		
	Map 88: Unplanned greenfield areas – Upper Hutt City Council.	New	Select stance	Part 1 Schedule 1		
	Map 89: Unplanned greenfield areas – Hutt City Council.	New	Select stance	Part 1 Schedule 1		
	Map 90: Highest and high erosion risk land (Pasture) – Te Awarua-o-Porirua.	New	Select stance	Freshwater		
	Map 91: Highest erosion risk land (Woody vegetation) – Te Awarua-o-Porirua.	New	Select stance	Freshwater		
	Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua.	New	Select stance	Freshwater		
	Map 93: Highest and high erosion risk land (Pasture) – Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	Map 94: Highest erosion risk land (Woody vegetation/clearance) – Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	Map 96: Mākara catchment.	New	Select stance	Freshwater		
	Map 97: Mangaroa catchment.	New	Select stance	Freshwater		