

**Submission on Wellington Regional Council's  
Proposed Plan Change 1 to the Natural Resources Plan**

15 December 2023

To: Greater Wellington Regional Council

By email: [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)

From: Royal Forest and Bird Protection Society NZ (Forest & Bird)

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- Forest & Bird could not gain an advantage in trade competition through this submission.
- Forest & Bird wishes to be heard in support of this submission, and would be prepared to consider presenting this submission in a joint case with others making a similar submission at any hearing.

## INTRODUCTION

1. Forest & Bird is New Zealand's largest non-governmental conservation organisation with many members and supporters. Volunteers in 50 branches carry out community conservation projects around New Zealand. Forest & Bird's constitutional purpose is:

*To take all reasonable steps within the power of the Society for the preservation and protection of the indigenous flora and fauna and the natural features of New Zealand.*

2. In support of that purpose, Forest & Bird regularly participates in resource management processes at the national, regional, and district level.

3. This is a submission on Proposed Plan Change 1 to the Natural Resources Plan, on behalf of Forest & Bird's branches and Forest & Bird nationally. It begins with general overall submission points (in this document) followed by specific submissions on each provision of interest to Forest & Bird (in the attached excel spreadsheet provided by the council).
4. The attached excel spreadsheet sets out Forest & Bird's more detailed submission points. The decisions sought are necessary to ensure the plan change:
  - a. Achieve the purpose and principles of the RMA;
  - b. Give effect to the National Policy Statement for Freshwater Management 2020;
  - c. Give effects to the provisions of the New Zealand Coastal Policy Statement 2010;
  - d. Give effect to the National Policy Statement for Indigenous Biodiversity; and
  - e. Give effect to the Regional Policy Statement.
5. Forest & bird also seeks further consequential or alternative relief as may be necessary and appropriate to address concerns identified in its submission.

## **GENERAL POINTS**

### **Definitions**

6. The definitions in PC1 are important in how the rules work. In some cases these definitions are limits or define key terms inappropriately, and amendments are required. See the attached excel spreadsheet. Further, many definitions simply cross-reference definitions found in legislation including regulations. The text should be set out for ease of use by plan readers.

### **Water quality target attribute state tables – DIN, DRP, periphyton, habitat, etc.**

7. While Forest & Bird is generally supportive of the Target Attribute State tables, the targets are too high in some part FMUs (e.g., DIN above 1 mg/L in some part FMUs). These need to be lower. In the Taupō part FMU the numeric target (e.g., for median Ammonia toxicity) appears to be above the modelled baseline. This is not permissible as targets must be at or below (better than) the baseline. More comments on the water quality targets are provided in the spreadsheet.

8. Target Attribute States should be introduced for 'habitat' and 'natural form and character' which river management / flood protection activities etc. must seek to achieve. These should be included as targets for Habitat Quality Index / Natural Character Index scores, and/or physical properties to achieve for the river - e.g., target states for average channel width, sinuosity, riffle/run/pool sequences, area of gravel, etc. This would be consistent with Policy 30 in the plan, including (c) "maintain or where practicable restore aquatic habitat diversity and quality, including: the form, frequency and pattern of pools, runs, and riffles in rivers, and the natural form of river". Activities should then be required to undertake activities in a way that illustrates they are maintaining habitat quality in accordance with the target attributes states (whether they be to maintain or improve).

### **Timeframes for target attribute states and objectives**

9. The target attribute state tables include timeframes, which are generally 2040. Under the NPSFM, target states are required to be set at intervals of no longer than 10 years (NPSFM s3.11). This means interim target states need to be set out in the plan (or a shorter timeframe is required – 2033 at the latest). The targets must also reflect the state that achieves the long term visions and must reflect these (which are currently part of the RPS plan change 1, so it is difficult to comment on these in detail prior to decisions).

### **Values**

10. It is not clear what the identified values are for each of the FMUs. These should be identified and each value should have at least one environmental outcome. It appears the environmental outcome objectives are combined (which we are not opposed to) but it is not clear which outcome relates to which value. This needs to be made clear.

### **Flows**

11. We understand that there is limited change to the flow provisions in the NRP through this plan change. However, we are concerned the flows provisions do not comply with the NPSFM. Environmental flows and levels need to be rules in the plan, as do take limits. In the proposed plan it appears flows, levels, and take limits are a mixture of policies, rules, and definitions. These should be clearly stated as rules – giving council the power to review existing consents to

bring them in line with new flows and limits. The rules also allow taking water below minimum flows, which provides for overallocation and is contrary to the NPSFM. Takes below minimum flows and in exceedance of allocation limits should be prohibited.

12. While the plan change does amend flows/allocation for the Porirua whitua, the s32 states that flows/allocation will be added for Te Whanganui a Tara 'in a later plan change'. It is not clear when that will occur. Forest & Bird is concerned about the effectiveness of this approach. Interim limits need to be set to ensure life supporting capacity requirements for indigenous species are safeguarded.
13. The flows/allocation approach for the Porirua whitua also allows takes for drinking water below minimum flows, so does not comply with the NPSFM directive to avoid over allocation. We are also concerned the take limits/allocation limits may not achieve the environmental outcomes.

#### **Te Mana o te Wai**

14. We support the concept of Te Mana o te Wai and want to see it effected throughout the plan. This will protect ecosystem health, as well as community health and the health of people that is critical to society.
15. Plan provisions should together achieve TMOTW. This should be set out at a high level in the RPS and then effected through the plan. As noted regarding long term visions above, how TMOTW is implemented is subject to PC1 to the RPS. Again, it is difficult to comment on this without decisions on PC1 to the RPS, but we note here that this will need to be considered as part of PC1 to the NRP.

#### **Action Plans**

16. With regard to Schedule 27L Freshwater AAction Plan requirements: A2 and A3 need to address all the Appendix 2B attributes for all the part FMUs (as required by NPSFM 3.12(2)(b)). As noted in the attached spreadsheet, we consider it important that this include natural form and character and habitat (as a part of ecosystem health). If the target attribute states are already achieved, the action plan should set out how they will be maintained. This should be reflected

in B1(6) and B2 which need amending to reflect actions to maintain (not to provide for “no further action” as currently proposed). The Schedule should also specify that action plans will set out how the target attribute states will be achieved within the timeframe set in the relevant tables, and this should be reflected in A1 and B2(1)(b). B3(1) is for attributes including nitrogen – but is critically missing DIN (i.e., it should include nitrogen for ecosystem health, not just for toxicity). The actions in B3(1) focus on sediment, but should be broader and needs actions added that relate to nitrate and DIN. The action plans also need to integrate with action plans required under 3.25 to return rivers to natural hard bottom states.

### **Nitrogen risk assessment tool**

17. The current provision for a ‘recognised nitrogen risk assessment tool’ allows a tool to be used to fulfil the policies in the plan by a process outside Schedule 1. Essentially, council could approve any tool so long as its ‘quantitative’ and assesses risk of nitrogen discharge. There are no other criteria or processes provided for approval, which raises questions around unlawful delegation and whether it is lawful to essentially amend the plan in that way.
18. Biophysical factors (i.e. soil and rainfall) are a critical factor in the risk and the actual impact on the environment. It is critical that any tool accounts for biophysical factors and relates to the actual discharge or environmental effects of that discharge. Any “recognised nitrogen risk assessment tool” must be subject to wider public scrutiny before being included in the plan.

### **Financial contributions**

19. The plan policies relate financial contributions to being for the purpose of ‘offsetting’. However, financial contributions are more akin to environmental compensation than offsetting.
20. Forest & Bird appreciates the way these appear to be envisioned is being used to improve stormwater treatment elsewhere in the catchment to ‘offset’ increased stormwater discharges elsewhere. This is very similar to offsetting, but is being proposed to be done by the council at an aggregated level, instead of by the consent holder at the project level.
21. The NPSFM requires avoidance, then minimisation, then offsetting before considering compensation. The policies in Plan Change 1 only require minimisation then jump straight to

compensation. This is inconsistent with the NPSFM. Schedule 30 suggests that s108 only allows financial contribution for the purpose of offsetting, however financial contributions can be for any purpose specified in the plan. Any reference to offset and compensation in the plan must be consistent with the offset and compensation framework in the NPSFM, good practice guidance on offsetting. In the coastal environment, the NZCPS will prevail use of offsetting and compensation may be contrary to NZCPS directives.

## **Farm Plans**

22. Proposed Plan Change 1 essentially sets up farming as a permitted activity provided there is a farm plan for the activity.
23. The requirements for farm plans are spread across PC1 Schedule 36 and the existing NRP, which could be confusing for plan users, and consideration should be given to whether this can be improved.
24. We note the plan does not have to permit farms that have farm plans – it can impose additional regulation. Given the significant challenge with contaminants in the Porirua whaitua in particular (e.g., sediment), it is critical that council regulates land use (including on smaller parcels of land) to manage cumulative effects. Council should also have the ability to decline resource consent for farming activity where it is not confident the effects will be appropriately managed by a farm plan. For this reason, council should have scope to decline consent in these whaitua and a stronger activity status than permitted is required. Permitted status is only appropriate if there is no need for the council to have oversight of the content of farm plans and they can be written by farm advisers in a way that there is certainty the adverse effects of farms will result in the desired environmental outcome. We are concerned this will not be possible in the Porirua Whaitua in particular.
25. In lieu of strengthening the activity status for farming, the requirements should be amended/strengthened and written in a way that is clear and does not require interpretation. For example, in Schedule 36:

- a. Management objective B should define 'revegetation' so that it means 'woody vegetation' or 'indigenous woody vegetation'. Otherwise it could be interpreted to mean grass, or weeds, etc.
- b. Management objective B should define 'not reasonably practicable' by setting out the circumstances or considerations that would make revegetation 'not reasonably practicable' or else it is up to a case-by-case assessment and could include considerations of cost or other goals of the farmer. If the 'not reasonably practicable' exemption is used, the certifier should assess the soil erosion control measures using an accepted methodology (not just estimating it).
- c. Management objective B should include not increasing nitrogen loss risk above the baselines in C(1) in order to maintain water quality and achieve policies of plan.
- d. E erosion risk plan needs to have clear enforceable goals, and the provisions for critical source areas need to apply across the farm – not just on high erosion risk land.
- e. F small stream riparian programme needs to have clear enforceable goals; clear criteria for how to assess risk of erosion, deposition and damage to the stream bed (a stocking rate threshold may be a good alternative); and clear criteria for when fencing is required, when it is not practicable, and how alternative measures to fencing to minimise stock access to water will be assessed. As proposed, we are concerned they do not implement WH.P26.

### **Ephemeral water courses**

26. Farm plan 'critical source area' management and small stream stock exclusion provisions need to be strengthened as above to protect ephemeral water courses.

**SEE ATTACHED EXCEL SHEET FOR FURTHER COMMENTS ON PROVISIONS**

Once you have completed your feedback, please email to [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)

Please enter your details below	
<b>*Submitter Name:</b> Full name, or Name of Organisation / Company	Forest & Bird
<b>Contact person for submission:</b> (If different to above)	Amelia Geary
<b>Telephone no:</b> (Not required)	Insert
<b>*Address for service:</b> (Email, or physical address) Please note, an <u>email address</u> is the preferred method	r@forestandbird.org.nz; a.geary@forestandbird.org.nz
<b>*I wish to be heard in support of my submission at a hearing</b>	Yes
<b>*I would consider presenting a joint case at the hearing with others who make a similar submission</b>	Yes
<b>*I could gain an advantage in trade competition through this submission</b>	No
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> A) adversely affects the environment; and B) does not relate to trade competition or the effects of trade competition	Select A or B
<b>In providing a submission to Greater Wellington, I agree to having read and understood the terms and process outlined in our <a href="#">Information Statement</a></b>	
If providing a submission on behalf of a company / organisation <b>I confirm that I have authority to do so:</b>	Signature
<b>Date:</b>	15/12/2023
Please enter your feedback in the next worksheet " <b>2) Feedback on Provisions</b> ". All of the provisions in the proposed change have been included so please place your comments in the corresponding cells. If you have questions on how to use this submission form please use our <a href="#">Submitter User Help Guide</a> or email one of our friendly team at <a href="mailto:regionalplan@gw.govt.nz">regionalplan@gw.govt.nz</a>	

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 <del>strikethrough</del> , and insertions should be identified using <b>bold</b> .
<b>2 Interpretation</b>	<b>2.2 Definitions</b>	Amended		Both		
	Afforestation	New	Oppose	Freshwater	Reference to full text better assists plan users.	Include full text of definition.
	Allocation amount	Amended	Select stance	Part 1 Schedule 1		
	Annual stocking rate	New	Support	Freshwater	Helps give effect to NPSFM provisions	Retain.
	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	Select stance	Part 1 Schedule 1	Reference to full text better assists plan users.	Include full text of definition of earthworks (from the NES).
	Effective hectares	New	Select stance	Freshwater		
	Environmental outcomes	New	Amend	Part 1 Schedule 1	Additional objectives are required to meet NPSFM requirements. This definition should include objectives WH.06, WH.07 and WH.08 and P.05 and P.06. These are the outcomes that relate to groundwater levels and integrity and the compulsory value of contact recreation. This may not be a comprehensive list.	Include reference to objectives WH.06, WH.07 and WH.08 and P.05 and P.06 (not there may be others we have missed).
	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	<i>Reference to full text better assists plan users.</i>	Include full text of definition.
	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	Amend	Freshwater	<i>The meaning set out in Regulation 4 of the Resource Management (Stock Exclusion) Regulations 2020 should be set out in full for ease of use, consistent with the PC1's treatment of the definition of "threatened species".</i>	Amend: "Has the same meaning as set out in Regulation <del>3</del> 4 of the Resource Management (Stock Exclusion) Regulations 2020: <b>Meaning:</b> <b>(a) break feeding; or</b> <b>(b) grazing on annual forage crops; or</b> <b>(c ) grazing on pasture that has been irrigated with water in the previous 12 months"</b>
	Limit	New	Select stance	Part 1 Schedule 1		
	Mechanical land preparation	New	Select stance	Freshwater		
	Nationally threatened freshwater species	New	Amend	Part 1 Schedule 1	<i>NPSFM refers to "threatened species" rather than "threatened freshwater species". Some species that rely on freshwater for part of their lifecycle will not constitute a "freshwater species".</i>	Amend to " <b>nationally threatened species</b> " or " <b>threatened species</b> "
	Nitrogen discharge risk	New	Oppose	Freshwater	<i>Nitrogen discharge risk must include consideration of biophysical factors influencing nitrogen loss, and the sensitivity of the receiving environment to that nitrogen loss.</i>	Amend as follows: "The quantitative assessment of nitrogen loss risk as determined using a recognised risk assessment tool <b>that addresses biophysical factors influencing nitrogen loss, and the sensitivity of the receiving environment to that nitrogen loss</b> ".
	Part Freshwater Management Unit	New	Select stance	Freshwater		
	Primary contact sites	New	Select stance	Freshwater		

	Recognised Nitrogen Risk Assessment Tool	New	Oppose	Freshwater	<i>Nitrogen risk assessment tools have been the subject of contention in terms of efficacy. The lack of reference to a widely acceptable tool remains a gap in the plan. It is therefore not appropriate to delete to Councils the ability to approve a tool, and a plan change or variation will be required to include such a tool.</i>	The tool that provides a quantitative assessment of risk of diffuse nitrogen discharge from rural land that <b>has been included in the plan using a plan change or variation</b> <del>has been approved for use as a recognised risk assessment tool by the Wellington Regional Council.</del>
	Redevelopment	New	Select stance	Part 1 Schedule 1		
	Registration	New	Select stance	Freshwater		
	Registered forestry adviser	New	Select stance	Freshwater		
	Replanting	New	Select stance	Freshwater	<i>Reference to full text better assists plan users.</i>	Include full text of definition.
	Sacrifice paddocks	New	Select stance	Freshwater	<i>The meaning set out in Regulation 3 of the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 should be set out in full for ease of use, consistent with the PC1's treatment of the definition of "threatened species".</i>	Include the actual text of Regulation 3 in the Plan itself: <b>means an area on which—</b> <b>(a) cattle are repeatedly, but temporarily, contained (typically during extended periods of wet weather); and</b> <b>(b) the resulting damage caused to the soil by pugging is so severe as to require resowing with pasture species</b>
	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	Support	Freshwater	<i>Helps give effect to NPSFM provisions</i>	Retain.

	Stock unit	New	Support	Freshwater	<i>Helps give effect to NPSFM provisions</i>	Retain.
	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	<i>Reference to full text better assists plan users.</i>	Set text of definition for "vegetation clearance" in full.
	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	Support	Freshwater	<i>Helps give effect to NPSFM provisions</i>	Retain.
<b>3 Objectives</b>	<b>Amendments to Chapter 3 - Objectives</b>	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		
	<b>3.6 Water quality</b>	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		
	<b>3.7 Biodiversity, aquatic ecosystem health and mahinga kai</b>	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	Amend	Part 1 Schedule 1	<i>Key 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>	Carry parameters through to new tables for the whaitua. See relief sought below for table 3.4 and the new table on water quality in the new Whaitua chapters.
	Table 3.4 Rivers and Streams.	Not applicable to Whaitua	Oppose	Part 1 Schedule 1	<i>Key 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	Oppose	Part 1 Schedule 1	<i>This is still relevant to the Whaitua and no replacement targets have been</i>	Retain the application of table 3.6 to the Whaitua. Amend to include nitrate-nitrogen target of < 1.0 mg/L to protect ecosystem health and drinking water.
	Table 3.7 Natural wetlands.	Amended	Amend	Part 1 Schedule 1	<i>This is still relevant to the Whaitua and no replacement targets have been provided. Amendment is needed to provide clearer target states using the wetland condition</i>	Retain the application of table 3.7 to the Whaitua. Add the wetland condition index as a measure of wetland ecosystem health and set a target of 10.
	Table 3.8 Coastal waters.	Not applicable to Whaitua	Amend	Part 1 Schedule 1	<i>Key parameters in table 3.8 are still relevant to the Whaitua and have not been carried over to the new target tables. These should be retained to give effect to NPSFM and NZCPS.</i>	Retain the application of attributes which are in this table but not in the new table 8.1 and 9.1 (or carry them through to the new tables).
	<b>3.8 Sites with significant values</b>	<b>Amended</b>		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	Select stance	Part 1 Schedule 1		

	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	Select stance	Part 1 Schedule 1		
<b>4 Policies</b>		Not applicable to Whait / Not applicable to Whaitua Te Awarua-o-Porirua		<b>Part 1 Schedule 1</b>		
	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		
	<b>4.6 Biodiversity, aquatic ecosystem health and mahinga kai.</b>	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		
	<b>4.7.3 Sites with significant indigenous biodiversity value.</b>	Amended		Part 1 Schedule 1		
	Policy P45: Protecting trout habitat.	Amended	Select stance	Part 1 Schedule 1		
	<b>4.9.1 Discharges to land and water.</b>	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	<i>The note in Policy 78 needs to be part of the policy proper to ensure it gives effect to NPSFM direction</i>	Delete the word "note"
<b>5.1 Air quality rules</b>	<b>5.1.2 Outdoor burning.</b>	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		
	<b>5.1.4 Large scale combustion activities.</b>	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		
	<b>5.1.5 Chemical and metallurgical processes.</b>	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		
	<b>5.1.7 Dust generating activities.</b>	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		
	<b>5.1.8 Food, animal or plant matter manufacturing and processing.</b>	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		
	<b>5.1.9 Fuel storage</b>	Amended		Part 1 Schedule 1		
	Rule R33: Petroleum storage or transfer facilities – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.10 Mobile sources.</b>	Amended		Part 1 Schedule 1		
	Rule R34: Mobile source emissions – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.11 Gas, water and wastewater processes.</b>	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		
	<b>5.1.12 Drying and kiln processes.</b>	Amended		Part 1 Schedule 1		
	Rule R36: Drying and heating of minerals – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.13 Discharge of agrichemicals.</b>	Amended		Part 1 Schedule 1		
	General conditions for the discharge of agrichemicals.	Amended	Support	Part 1 Schedule 1	<i>Creates more consistency with NZCPS and with NPSFM requirements to manage receiving environments</i>	Retain as proposed.
	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		
	<b>5.1.14 Fumigation.</b>	Amended		Part 1 Schedule 1		
	Rule R40: Fumigation – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.15 All other discharges</b>	Amended		Part 1 Schedule 1		
	Rule R42: All other discharges – discretionary activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.2 and 5.3 Discharges to land and water and land use rules</b>	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		
	<b>5.4.4 Uses of beds of lakes and rivers general conditions.</b>	Amended		Part 1 Schedule 1		
	Beds of lakes and rivers general conditions.	Amended	Support	Part 1 Schedule 1	<i>Increases clarity</i>	Retain as proposed.
	<b>5.4.5 Uses of beds of lakes and rivers.</b>	Amended		Freshwater		
	Rule R128: New structures – permitted activity.	Amended	Amend	Freshwater	<i>While R128 has been narrowed to no longer include "erosion protection structures" (and we support this narrowing), it still provides for "debris arrestor structures" and "structures associated with vegetative edge protection". up to a size of 10m2. This is large enough to alter the natural character and habitat of the river, and frustrates the ability of the plan to achieve outcomes directed by NPSFM Policy 7 (loss of river extent and values is avoided...) and</i>	Remove permitted status for "debris arrestor structures" and "structures associated with vegetative edge protection" to ensure these activities are managed in a way that maintains and restores physical habitat in riverbeds and natural form and character.  Introduce a condition of the rule (in the general conditions) that requires compliance with Target Attribute States (which should be amended to include habitat and natural form and character targets - see relief sought elsewhere).

	Rule R132: Minor sand and gravel extraction – permitted activity.	Amended	Amend	Freshwater	<i>Compliance with target attribute states is required to give effect to NPSFM Policy 7 (loss of river extent and values is avoided...) and Policy 9 (habitats of indigenous freshwater species are protected), as well as the requirement to manage water bodies to achieve all five components of ecosystem health, which includes habitat (physical form, etc) and to potentially manage for natural form and character as an additional value. And NRP Policy 30, which includes</i>	Amend general conditions on above rule. See relief sought above. (and introduce target states for habitat and natural form and character - see relief sought elsewhere).
	Rule R133: Gravel extraction for flood protection purposes or erosion mitigation inside sites of significance – discretionary activity.	Amended	Amend	Freshwater	<i>R133 provides a level of discretion and potential protection that should be provided more widely to other water bodies, particularly Outstanding Waterbodies, in order to ensure consistency with NPSFM Policy 7 and 9, and requirements to manage habitat and natural form and character, including NRP Policy 30.</i>	Include Schedule A1, A2, and A3 in R133 as areas where excavation, deposition, or disturbance are discretionary activities.
	<b>5.4.7 All other uses of the beds of lakes and rivers.</b>	Amended		Part 1 Schedule 1		

	Rule R145: All other uses of river and lake beds – discretionary activity.	Amended	Amend	Part 1 Schedule 1	<i>Prohibited activity status provides the most certainty that critical policy direction under the NPSFM and ultimately the RMA are achieved, and protects fish passage.</i>	Remove the word "note". Make placement of passive gates prohibited (i.e., strengthen rule beyond NES minimum).
	<b>5.4.8 Damming and diverting water</b>	New		Freshwater		
	Rule R151A: Ongoing diversion of a river – permitted activity.	New	Oppose	Freshwater	This rule could allow a diversion once in place to continue indefinitely, no matter the size or effects. These diversions should be subject to assessments and consenting to ensure effects on natural form and character and habitat in particular are managed, as well as ecosystem health and Te Mana o te Wai. Permitted activity status is inappropriate and council needs scope to manage potential ongoing effects.	Make discretionary.
	<b>5.5 Water allocation rules</b>	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		
<b>6 Other methods</b>	<b>6.16 Freshwater Action Plan programme</b>	New		Freshwater		

	Method M36: Freshwater Action Plan programme.	New	Support	Freshwater	<i>This is consistent with NPSFM direction.</i>	Retain as proposed.  Note Forest & Bird's submission point on Schedule 27 A2 that seeks the inclusion of direction to prepare action plans for habitat and natural form and character in rivers and streams.
	Method M37: Freshwater Action Plan for the Parangarahu Lakes.	New	Support	Freshwater	<i>This is consistent with NPSFM direction.</i>	Retain as proposed.
	Method M38: Freshwater Action Plan for the Rangituhi catchment.	New	Support	Freshwater	<i>This is consistent with NPSFM direction.</i>	Retain as proposed.
	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>This is consistent with NPSFM direction, in particular Policies 7 and 9, the requirements to protect habitat as a component of ecosystem health, and NRP Policy 30.</i>	Retain as proposed.  Note Forest & Bird's submission point on Schedule 27 A2 that seeks the inclusion of direction to prepare action plans for habitat and natural form and character in rivers and streams to then ensure this method is carried through to and consistent with the schedule.
	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Amend	Freshwater	<i>Prioritisation of areas for restoration of fish passage should be based on both species present in the catchment/area AND the area and quality of the habitat that would become available (e.g., there may be little point in opening up access to poor habitat just because their are valuable species downstream, as outcomes for them may be better improved by restoring access to higher quality habitat elsewhere).</i>	Amend M40 (b) to state  "(b) prioritising remediation of fish passage (if appropriate to protect species) in locations highly valued for their indigenous fish and mahinga kai species <b>in places where this would provide access to high quality habitat or large areas of habitat</b> "
	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>This is consistent with NPSFM direction.</i>	Retain as proposed.
	<b>6.17 Small farm property registration</b>	New		Freshwater		

	Method M42: Small farm property registration within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
	<b>6.16 Supporting improved water quality outcomes.</b>	New		Part 1 Schedule 1		
	Method M43: Supporting the health of urban waterbodies.	New	Amend	Part 1 Schedule 1	<p><i>The RMA definition of "waterbody" does not capture estuaries or harbours.</i></p> <p><i>Reference to wetlands is required to give effect to NPSFM policy 6, and section 3.22.</i></p> <p><i>The method does not go far enough to direct GWRC to manage pollution from the public and the potential need to strengthen bylaws related to urban pollution.</i></p>	<p>Amend chapeau as follows: Wellington Regional Council will undertake programme(s) to support the health of waterbodies <b>and coastal water</b>, including rivers and streams, <b>wetlands</b>, estuaries and harbours, impacted by urban activities, including to: Amend (b)(ii): investigate options to reduce the hydrological impacts on freshwater bodies <b>and coastal water</b> of stormwater capture...</p> <p>Include in M43 (b) (i) that education materials will also be targeted at the public to cover activities like washing cars on driveways and on the street, pool water discharges, etc.</p> <p>Include in M43 (a) that GWRC will investigate how it can strengthen stormwater, waste, and trade waste bylaws to reduce pollution, including from car washing on driveways and streets.</p> <p>Include direction to investigate regulating / requiring water sensitive design, rather than just providing 'education' on it, if this is not included through this plan change elsewhere.</p>
	Method M44: Supporting the health of rural waterbodies.	New	Amend	Part 1 Schedule 1	<p><i>The RMA definition of "waterbody" does not capture estuaries or harbours.</i></p> <p><i>Reference to wetlands is required to give effect to NPSFM policy 6, and section 3.22.</i></p>	<p>Amend chapeau as follows: Wellington Regional Council, working with primary sector organisations, will undertake a programme(s) to support the health of waterbodies <b>and coastal water</b>, including rivers, streams, <b>wetlands</b>, estuaries and harbours, impacted by rural activities, including to:</p> <p>Add a new point "<b>(e) investigate options, including financial support and rates relief options, education, advice, and provision of plants, to encourage and enable wetland restoration</b>"</p>
	Method M45: Funding of wastewater and stormwater network upgrades	New	Support	Part 1 Schedule 1	<i>Additional funding and investment will be required to meet outcomes.</i>	Retain.
<b>8 Whaitua Te Whanganui-a-T</b>	<b>8.1 Objectives</b>	New		Both		

	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.	New	Amend	Part 1 Schedule 1	<p><i>The explanation of the wai ora state is treated as a note and should form part of the objective itself. "Notes" (or "explanatory notes" or "guidance notes") can be argued to have no legal force. It is important that the definition of "wai ora state" has legal effect and is not undermined.</i></p> <p><i>2100 is too far away as a target for achieving wai ora. Biodiversity loss and climate change are at critical levels and have become existential threats.</i></p>	<p>Amend chapeau: "The health of all freshwater bodies, <b>ephemeral watercourses</b>, and the coastal marine area..."</p> <p>Delete the word "note".</p> <p>Retain the balance of the objective.</p> <p>Amend the target timeframe to be 2050, or to provide part-FMU / catchment specific timeframes that account for the relative ease/difficulty of achieving targets in different catchments.</p>
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	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	<p><i>2040 is too far away as a target for achieving "maintained" water quality. The intent of the Essential Freshwater program was to halt freshwater degradation and "Start making immediate improvements so water quality improves within five years". Biodiversity loss and climate change are at critical levels and have become existential threats. More ambition is required. Ephemeral watercourses should also be</i></p>	<p>Amend as follows: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers, <b>ephemeral watercourses</b>, and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora, such that by <del>2030</del> <b>2040</b>:</p> <p>Include reference to natural form and character in the objective (under (a)) and refer to ecosystem health as it is more consistent with NPSFM. i.e., "(a) water quality, habitats, <b>natural form and character</b>... are at a level where the state of <del>aquatic life</del> <b>ecosystem health</b> is meaningfully improved..."</p>
	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	Oppose	Part 1 Schedule 1	<p><i>Timeframe is too far away to ensure that the coastal values in Te Whanganui-a-Tara are not compromised or lost.</i></p>	Amend timeframe for achievement to 2030.
	Table 8.1 Coastal water objectives.	New	Oppose	Part 1 Schedule 1	<p><i>Key coastal water quality parameters are missing and more stringent timeframes are required</i></p>	<p>Include a parameter for Turbidity (<b>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: &lt;6.9; Wai Tai: No discernible change</b>)</p> <p>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.</p> <p>Amend Wai Tai unit for <i>Enterococci</i>: <del>&lt;200</del> <b>&lt;40</b></p> <p>Add interim timeframes as per NPSFM 3.11.</p>

	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.	New	Oppose	Part 1 Schedule 1	<p><i>NPSFM refers to "threatened species" (Appendix 1A) rather than "threatened freshwater species" ("freshwater species" generally are referred to in Policy 9). Some threatened species that rely on freshwater for part of their lifecycle may not constitute a "freshwater species". Amendment also needed to definition. Providing a standalone objective for habitat ensures implementation of NPSFM policy 7 and 9, and</i></p>	<p>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.</p> <p>Retain balance of policy to provide direction for protection and monitoring of habitat.</p>
	Objective WH.05: 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	<p><i>Timeframe is too far away to ensure that the coastal values are not compromised or lost.</i></p>	Amend timeframe for achievement to 2030.

	Table 8.2 Target attribute states for lakes.	New	Oppose	Freshwater	<i>Table 8.2 fails to carry through important measures of lake ecosystem health from Table 3.5 of the NRP, including mahinga kai. The NPSFM requires that if Target Attribute States are set for a long term, interim states must be set out. Table 8.2 sets out targets for 2040, therefore there should be interim states set out for 2033 at the latest.</i>	Amend Table 8.2 to 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, and/or set out interim target states if the timeframe remains 2040.
	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	New	Support	Freshwater	<i>Gives effect to the NPSFM 2020</i>	Retain as proposed
	Objective WH.O7: The physical integrity of aquitards is protected so that confined aquifer pressures are maintained.	New	Support	Freshwater	<i>Gives effect to the NPSFM 2020</i>	Retain as proposed
	Objective WH.O8: Primary contact sites within Te Awa Kairangi/Hutt River, Pākuratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact.	New	Amend	Freshwater	<i>2040 is too far away as a target for achieving "at least maintained" water quality. The intent of the Essential Freshwater program was to halt freshwater degradation and "Start making immediate improvements so water quality improves within five years". More ambition is required.</i>	Shorten timeframe to 2030

	Table 8.3 Primary contact site objectives in rivers.	New	Select stance	Freshwater	<i>The NPSFM (section 3.11) requires that if Target Attribute States are set for a long term, interim states must be set out, and if a state is already achieved, a date for must be set out from which maintenance will be continued. Table 8.3 sets out targets for 2040, therefore there should be interim states set out for 2033 at the latest.</i>	Set targets for 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.
	Objective WH.09: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	New	Amend	Freshwater	<i>Natural form and character' is a key value of rivers and streams in the Te Whanganui-a-Tara area and is directed as a potential value in Appendix 2B of the NPSFM, along with habitat in Appendix 2A. To protect habitat, protection of natural form and character is required.</i>	Amend chapeau to include natural form and character - "Water quality, habitats, <b>natural form and character</b> , water quantity and ecological processes..." and then amend Table WH.09 to include physical habitat and natural form and character attributes.  Retain balance of objective.

	Table 8.4: Target attribute states for rivers.	New	Amend	Freshwater	<p><i>It is not clear what river types are covered by each part FMU.</i></p> <p><i>Periphyton targets should be no higher than 120 mg to protect ecosystem health.</i></p> <p><i>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.</i></p> <p><i>MCI targets should be higher to protect ecosystem health. The table is missing attributes</i></p>	<p>State river type and class for each of the part FMUs</p> <p>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).</p> <p>Amend nitrate toxicity target to be NPSFM 'A' band for all part FMUs.</p> <p>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 &amp; 6). Minimum DIN target should be no higher than 1.0.</p> <p>Clearly define what fish community health as determined by experts actually means</p> <p>Set higher targets for MCI attributes</p> <p>Retain 'nuisance macrophytes', 'periphyton cover', mahinga kai, and toxicants attributes from table 3.4</p> <p>Retain groundwater attributes from table 3.6</p> <p>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 1.0).</p> <p>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.</p>
	<b>8.2 Policies</b>	New		Both		
	Policy WH.P1: Improvement of aquatic ecosystem health.	New	Amend	Part 1 Schedule 1	<p><i>Explicit provision for natural form and character should be included.</i></p> <p><i>The policy should also include direction that "enhancement" of flows should be through limits and natural means, not 'stream augmentation' or managed aquifer recharge.</i></p>	<p>Amend (b) to read "restoring habitats <b>and natural form and character</b>"</p> <p>Amend (c) to include "by setting limits and reducing allocation volumes in over-allocated catchments, and by restoring natural form and character to promote natural aquifer recharge"</p> <p>Retain balance of policy.</p>

	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	New	Amend	Part 1 Schedule 1	<i>The direction to prohibit unplanned greenfield development is supported but the remaining policy direction in (a) is opposed. This policy effectively supports compensatory measures, by means of financial contributions, for stormwater contamination - an approach that is contrary to RMA s107, the NZCPS, and the effects management hierarchy under the NSPFM. Financial contributions per se are not an "offset". Livestock should be</i>	Amend (a) as follows: "prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants <b>so that adverse effects are avoided</b> and requiring financial contributions as to offset adverse effects from residual stormwater contaminants"  Amend clause (e) so that it refers to ephemeral watercourses, wetlands and estuaries.  Add a clause "(i) land use intensification that individually or cumulatively may lead to a decline in water quality is prohibited"
	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	New	Support	Freshwater	<i>Ensures NPSFM direction is met.</i>	Retain
	Policy WH.P4: Achievement of the visual clarity target attribute states.	New	Support	Freshwater	<i>Ensures NPSFM direction is met.</i>	Retain
	Table 8.5: Sediment load reductions required to achieve the visual clarity target attribute states.	New	Amend	Freshwater	<i>NPSFM requires interim timeframes for Target Attribute States of no more than 10 years.</i>	Shorten timeframes to 2030 or provide interim goals
	Policy WH.P5: Localised adverse effects of point source discharge.	New	Oppose	Part 1 Schedule 1	<i>Policy WH.P5 is unduly narrow and repeats matters from RMA s70 which is not expressly limited to point source discharges. Policy WH.P5 must be broadened to capture all discharges.</i>	<del>Policy WH.P5: Localised adverse effects of point source discharge</del> The localised adverse effects of <del>point source</del> discharges to freshwater and coastal water beyond the zone of reasonable mixing are avoided or minimised, including by avoiding:

	Policy WH.P6: Cumulative adverse effects of point source discharges.	New	Support	Part 1 Schedule 1	<i>Helps give effect to NPSFM by improving discharge management</i>	Retain
	Policy WH.P7: Discharges to groundwater.	New	Amend	Freshwater	<i>Ensures groundwater is protected and restored to support ecosystem health and drinking water values</i>	Retain and support policy with an objective with target attribute states for groundwater quality, including a target of < 1.0 mg/L nitrate-nitrogen for groundwater to protect human and ecosystem health.
	Policy WH.P8: Avoiding discharges of specific products and waste.	New	Amend	Part 1 Schedule 1	<i>The discharges referred to must be broadened to include anything at a concentration that may kill fish.</i>	Add "(e) rubbish (f) agrichemicals, fertilisers, persistent chemicals (g) any other material that may kill fish"
	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	New	Amend	Part 1 Schedule 1	<i>Additional toxicants should be referred to to protect ecosystem health. These are already in place in table 3.4 and should be carried through.</i>	Amend to widen reference to include other toxicants, as per the NRP Table 3.4 (ANZG (2018) Default Guideline Values). i.e., "...managed so that the baseline water quality state for <b>toxicants, including</b> copper and zinc, is maintained, or improved where degraded, including in the relevant..."
	Policy WH.P10: Managing adverse effects of stormwater discharges.	New	Support	Part 1 Schedule 1	<i>Supports achievement of ecosystem health</i>	Retain
	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	New	Amend	Part 1 Schedule 1	<i>Higher levels of control are required where stormwater is coming from a high risk location</i>	Require resource consent for discharges of stormwater from high risk areas
	Policy WH.P12: Managing stormwater from a port or airport.	New	Amend	Part 1 Schedule 1	<i>Higher levels of control are required where stormwater is coming from a high risk location</i>	Require resource consent for discharges of stormwater from high risk areas
	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	Amend	Part 1 Schedule 1	<i>Reducing adverse effects to "the extent practicable" enables cost considerations to be factored into decision-makers, which are too often relied upon to side-step taking more environmentally responsible approaches. Reference to "where possible" is required.</i>	The adverse effects of stormwater discharges from new greenfield development shall be minimised, and adverse effects of stormwater discharges from existing urban areas reduced to the extent <del>possible, practicable,</del>  Insert explicit direction referring to and requiring water sensitive design for new and redeveloped areas.
	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	New	Oppose	Part 1 Schedule 1	<i>Higher order direction (including both the NZCPS and NPSFM) do not provide for offsetting and compensation as expressed in Policy WH.P15. Further, financial contributions are compensation and not an offset.</i>	Amend to require adverse effects of residual stormwater contaminants to be "avoided, remedied, or mitigated".
	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	New	Support	Part 1 Schedule 1	<i>The policy direction reflects the NZCPS and NPSFM 2020</i>	Retain.
	Policy WH.P17: General wastewater policy to achieve target attribute states and coastal objectives.	New	Support	Part 1 Schedule 1	<i>The policy direction reflects the NPSFM 2020</i>	Retain. Note changes to timeframe may be required to ensure there and interim timeframes consistent with NPSFM direction in s3.11.
	Policy WH.P18: Progressing works to meet Escherichia coli target attribute states.	New	Support	Freshwater	<i>The policy direction reflects the NPSFM 2020</i>	Retain
	Policy WH.P19: Managing wastewater network catchment discharges.	New	Amend	Part 1 Schedule 1	<i>Stronger policy is needed to give effect to NPSFM</i>	Amend (c) to read " <b>eliminate dry weather discharges</b> by progressively reducing the frequency and/or volume of dry weather discharges or the..."
	Policy WH.P20: Managing existing wastewater treatment plant discharges.	New	Amend	Part 1 Schedule 1	<i>The policy only seems to comment on maintaining or improving discharge quality where targets are already met.</i>	Amend to include explicit point about reducing e coli loads where target states are currently <u>not met</u> .
	<b>8.2.4 Rural land use and earthworks</b>	New		Both		

	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	New	Amend	Freshwater	<i>Ephemeral watercourses and estuaries should also be referred in clause (d) as these can support high ecological values</i>	"(d) excluding stock from water bodies, <b>ephemeral watercourses, and the coastal marine area</b> as a limit on land use,"  Retain balance of policy.
	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	New	Oppose	Freshwater	<i>The policy only directs reduction of discharges on large properties and horticultural properties. This risks not capturing discharges that cumulatively are significant. Also, the efficacy of this policy is contingent on an adequate nitrogen risk assessment tool which, per its definition, is proposed to be (unlawfully) delegated to Council to approve. Apart from these aspects, Forest &amp; Bird is generally supportive of the remaining policy direction.</i>	Amend to provide council scope to require reductions in discharges from smaller land parcels.  See relief sought for definition of "recognised nitrogen risk assessment tool".
	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	New	Support	Freshwater	<i>Provides a mechanism to reduce sediment loads and therefore protect rivers and receiving environments from the adverse effects of sediment, which is significantly degrading habitat and destroying Te Awarua-o-Porirua</i>	Retain

	Policy WH.P24: Phasing of farm environment plans.	New	Amend	Part 1 Schedule 1	<i>Deposited sediment is also a critical measure of sediment movement through the catchment and of ecological consequences for native species</i>	Amend to include deposited sediment - "prioritises those part Freshwater Management Units where Table 8.4 shows that suspended fine sediment <b>or deposited fine sediment</b> has a baseline state of D and/or where dissolved inorganic nitrogen is shown as being in need of improvement"
	Policy WH.P25: Managing rural land use change.	New	Support	Freshwater	<i>Helps give effect to NPSFM</i>	Retain
	Policy WH.P26: Managing livestock access to small rivers.	New	Support	Freshwater	<i>This additional direction is required to ensure water quality outcomes can be met, but should be more specific and applied more widely to manage e coli and sediment in all FMUs and part FMUs.</i>	Include detail in the policy on where stock should be restricted from and by how much (e.g., 5m setback), and the frequency.  Extend application of policy to all FMUs and part FMUs to protect water quality.
	Policy WH.P27: Promoting stream shading.	New	Amend	Freshwater	<i>The restoration of stream shade can improve water quality and habitat in streams - beyond just assisting with meeting periphyton targets (e.g., for temperature, food provision for fish, leaf litter provision). More active and positive direction on stream shading is also justified.</i>	Contribute to the achievement of aquatic ecosystem health by <del>promoting</del> <b>requiring</b> the progressive shading of streams <del>where nutrient reductions alone will be insufficient to achieve periphyton target attribute states.</del>
	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	New	Amend	Freshwater	<i>Retirement of high risk land is required to achieve water quality outcomes. Larger setbacks are required and limits on the area of exposed soil are also required.</i>	Include direction that large setbacks are required in areas of plantation forestry and include a cap on the area logged in one harvest (or direct selective harvesting where not all trees are taken out). Retain (c) to assist in eventual retirement of highest risk land.

	Policy WH.P29: Management of earthworks.	New	Amend	Part 1 Schedule 1	<i>Setback distances from waterways (of 10 metres or more) are an effective method of ensuring fine sediment particles from earthworks are removed and to prevent adverse effects on ecosystems.</i>	Add a new clause: <b>(x) requiring setback distances, of no less than 10 metres, from surface water bodies, ephemeral watercourses, and the coastal marine area.</b>
	Policy WH.P30: Discharge standard for earthworks.	New	Amend	Part 1 Schedule 1	<i>Controls on deposited sediment are also required</i>	Amend to include (e) "the discharge shall not, after the zone of reasonable mixing, result in: (i) a change in deposited sediment cover of more than 20%, or (ii) an increase in deposited sediment to be more than 20% of the bed"
	Policy WH.P31: Winter shut down of earthworks.	New	Support	Part 1 Schedule 1	<i>Reduces risk of sediment degrading ecosystems</i>	Retain
	<b>8.2.5 Water allocation</b>	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>	Retain.
	Policy WH.P33: Core allocation in Whaitua Te Whanganui-a-Tara.	New	Oppose	Freshwater	<i>The NRP states over-allocation will be considered through the Whaitua Implementation Programme. This plan change is the result of that yet it does not amend the policy direction here. The flow and allocation limits for Whaitua Te Whanganui-a-Tara cannot be said to give effect to the NPSFM 2020 or achieve the purpose of the Act. Interim Interim limits need to be set to ensure life supporting capacity requirements for indigenous species are safeguarded.</i>	Amend and include further provisions to direct phase out of over-allocation, set interim flow and allocation limits that give effect to NPSFM Policy 11, and safeguard the life-supporting capacity requirements of indigenous species that rely on water, pending any separate plan change.

	<b>8.3 Rules</b>	New		Both		
	<b>8.3.1 Discharges of contaminants</b>	New		Part 1 Schedule 1		
	Rule WH.R1: Point source discharges of specific contaminants – prohibited activity.	New	Support	Part 1 Schedule 1	<i>Ensures NPSFM direction and water quality outcomes are met</i>	Retain as proposed
	<b>8.3.2 Stormwater</b>	New		Both		
	Rule WH.R2: Stormwater to land – permitted activity.	New	Neutral	Freshwater		Retain
	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water – permitted activity.	New	Support	Part 1 Schedule 1	<i>Helps give effect to NPSFM and RMA</i>	Retain
	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity.	New	Support	Part 1 Schedule 1		Retain
	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	New	Oppose	Part 1 Schedule 1	<i>Rule WH.R5 contains elements that need to be subject to more Council oversight. Many elements, such as clause (h), are not sufficiently certain and enforceable for a permitted activity, and leave discretionary assessment to the plan user as to whether the activity is permitted or requires consent. Higher activity status and the addition of clearer and enforceable standards are required to ensure that both compliance with s 70 RMA is achieved</i>	Reclassify Rule WH.R5 as a controlled activity and include alternative standards that are enforceable and distinguish between discharges that would not have significant adverse effects on aquatic life and those having such effects that then require consent under a higher activity classification. Explicitly require 'water sensitive urban design' as a condition of consent (as per WH.R6), including rainwater storage tanks at a property level (which are accessible to provide water for gardening and emergency water supply) and stormwater treatment via wetlands, swales, and rainwater gardens.

	Rule WH.R6: Stormwater from new greenfield impervious surfaces – controlled activity.	New	Oppose	Part 1 Schedule 1	<i>Controlled activity status is inappropriate, particularly as the rule has effect in the coastal environment where the NZCPS applies. The inability to refuse consent may not give effect to NZCPS directions and RMA s107(1). Higher activity status is required. Clause c should be deleted as it is inconsistent with the effects management hierarchy.</i>	Reclassify Rule WH.R6 as a discretionary activity and delete clause c.
	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	Oppose	Part 1 Schedule 1	<i>Discharges may have adverse effects beyond aquatic ecosystem health and mahinga kai, and include use and enjoyment of the CMA by surfers/swimmers. Discretionary activity status will all matters, including unforeseen matters, to be considered.</i>	Reclassify as a discretionary activity rule or add a new matter of discretion " <b>adverse effects on the environment</b> ".
	Rule WH.R9: Stormwater from a local authority or state highway network–restricted discretionary activity.	New	Oppose	Part 1 Schedule 1	<i>The rule does not allow all effects to be considered.</i>	Reclassify as a discretionary activity rule.
	Rule WH.R10: Stormwater from new state highways– discretionary activity.	New	Amend	Part 1 Schedule 1	<i>Clause c does not reflect the effects management hierarchy.</i>	Delete clause c
	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces – discretionary activity.	New	Amend	Part 1 Schedule 1	<i>clause (b) does not reflect the effects management hierarchy.</i>	Delete clause (b).

	Rule WH.R12: All other stormwater discharges – non-complying activity.	New	Support	Part 1 Schedule 1	<i>Consistent with the RMA's purpose (in conjunction with further and consequential amendments sought by Forest &amp; Bird).</i>	Retain.
	Rule WH.R13: Stormwater from new unplanned greenfield development – prohibited activity.	New	Support	Part 1 Schedule 1	<i>Provides greatest assurance that the RMA's purpose will be met.</i>	Retain.
	<b>8.3.3 Wastewater</b>	New		Part 1 Schedule 1		
	Rule WH.R14: Wastewater network catchment discharges – restricted discretionary activity.	New	Amend	Part 1 Schedule 1	<i>Discretionary activity status ensures any unforeseen matters can be considered</i>	Reclassify as a discretionary activity.
	Rule WH.R15: Existing wastewater discharges from a treatment plant – discretionary activity.	New	Support	Part 1 Schedule 1	<i>Consistent with the RMA's purpose.</i>	Retain.
	Rule WH.R16: All other discharges of wastewater – non-complying activity.	New	Support	Part 1 Schedule 1	<i>Consistent with the RMA's purpose.</i>	Retain.
	<b>8.3.4 Land uses</b>	New		Freshwater		
	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	New	Oppose	Freshwater	<i>The removal of pest plants may still cause sediments to be released and certain pest plants may still be habitat for indigenous species. (e.g., a whole hillside of gorse could be removed, which could then threaten hill stability if no plan is in place for restoration of that hillside). Additional standards are required. Mitigation plans are insufficient on their own and therefore a minimum setback from water bodies, coastal marine</i>	<p>Include additional standards:  <b>(x) the vegetation clearance is not undertaken within, or within 10 metre setback from, a surface water body, ephemeral watercourse, or the coastal marine area</b>  <b>(x) vegetation clearance does not exceed 200m<sup>2</sup> per property in any consecutive 12-month period</b></p> <p>Delete clause (a)(ii). In the alternative, should pest plants be referred to, create a definition of pest plants as those plants listed in the GWRC pest management plan. Introduce a requirement for pest plant removal to not exceed a given area per year- i.e., make it clear the 200m<sup>2</sup> threshold applies at which point you move to WH.R18.</p>

	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	New	Oppose	Freshwater	<i>The inability to refuse consent may mean critical policy direction under the NPSFM or NZCPS will not be achieved, higher activity status is required.</i>	Reclassify Rule WH.R18 as a discretionary activity or, alternatively, a restricted discretionary activity and include " <b>adverse effects on the environment</b> " as a matter of discretion.
	Rule WH.R19: Vegetation clearance – discretionary activity.	New	Support	Freshwater	<i>Consistent with the RMA's purpose (in conjunction with further and consequential amendments sought by Forest &amp; Bird).</i>	Retain.
	Rule WH.R20: Plantation forestry – controlled activity.	New	Amend	Freshwater	<i>The inability to refuse consent may mean critical policy direction under the NPSFM or NZCPS will not be achieved, higher activity status is required.</i>	Reclassify as a discretionary activity.
	Rule WH.R21: Plantation forestry – discretionary activity.	New	Support	Freshwater	<i>Manages sediment from activity</i>	Retain
	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.	New	Support	Freshwater	<i>Consistent with the purpose of the RMA.</i>	Retain.
	<b>8.3.5 Earthworks</b>	New		Both		
	Rule WH.R23: Earthworks – permitted activity.	New	Oppose	Freshwater	<i>A 5 metre setback is not sufficient to protect ecosystems and maintain water quality. Ephemeral watercourses should also be referred as they have ecological value and, when protected, can reduce contaminant loads.</i>	(d) the earthworks shall not <b>occur within, or within a 10.5 m setback from, of</b> a surface water body, <b>ephemeral watercourse</b> , or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body, <b>ephemeral watercourse</b> , or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, <b>ephemeral watercourse</b> , the coastal marine area, or onto land that may enter a surface water body, <b>ephemeral watercourse</b> or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body, <b>ephemeral watercourse</b> , or the coastal marine area, including via a stormwater network.

	Rule WH.R24: Earthworks – restricted discretionary activity.	New	Oppose	Part 1 Schedule 1	<i>The listed matters of discretion are not wide enough to ensure all adverse effects on all important ecological values are addressed.</i>	Reclassify as a discretionary activity rule.
	Rule WH.R25: Earthworks – non-complying activity.	New	Support	Part 1 Schedule 1	<i>Consistent with the RMA's purpose (in conjunction with further and consequential amendments sought by Forest &amp; Bird).</i>	Retain.
	<b>8.3.6 Nutrients and sediment from pastoral farming</b>	New		Freshwater		
	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares – permitted activity.	New	Amend	Freshwater	<i>It is critical that council has information on land use pressures to ensure they can appropriately manage inputs and set limits on resource use, as well as assess effectiveness of the plan. This means information needs to be provided by landowners.</i>	Amend to include " <b>(e2) annual nitrogen fertiliser use, the annual stocking rate, and the winter stocking rate is provided to Wellington Regional Council annually</b> "  Retain balance of rule.
	Rule WH.R27: Farming activities on 20 hectares or more of land – permitted activity.	New	Amend	Freshwater	<i>Critical information on farm inputs needs to be required in the rule to ensure council has information on pressures in the catchment</i>	Amend rule to require the reporting of N fertiliser and stocking rate regularly (this is what has been done in PC1 Waikato). Amend the rule to include additional conditions that will ensure drinking water etc is protected, or amend Schedule 36 to ensure those things are covered (see relief sought for schedule 36).
	Table 8.6: Phase-in of farm environment plans for part Freshwater Management Units.	New	Support	Freshwater	<i>Ensures NPSFM outcomes can be met and there is limited delay in implementation</i>	Retain
	Rule WH.R28: Livestock access to a small river – permitted activity.	New	Support	Freshwater	<i>Ensures NPSFM outcomes can be met, including limiting sediment and e coli pollution</i>	Retain

	Rule WH.R29: Livestock access to a small river – discretionary activity.	New	Support	Freshwater	<i>Ensures NPSFM outcomes can be met, including limiting sediment and e coli pollution</i>	Retain
	Rule WH.R30: The use of land for farming activities – discretionary activity.	New	Support	Freshwater	<i>Helps give effect to NPSFM and RMA</i>	Retain
	Rule WH.R31: Change of rural land use – discretionary activity.	New	Oppose	Freshwater	<i>A change of land use could lead to increase in contaminants, contrary to the plan policies. This could potentially lead to a decline in water quality, which is over-allocation contrary to NPSFM direction</i>	Reclassify as a non-complying activity.
	Rule WH.R32: Farming activities – non-complying activity.	New	Support	Freshwater	<i>Ensures NPSFM outcomes can be met</i>	Retain
	<b>8.3.7 Take and use of water</b>	New		Freshwater		
	Rule WH.R33: Take and use of water in the Whaitua Te Whanganui-a Tara – restricted discretionary activity.	New	Oppose	Freshwater	<i>of discretion are not wide enough to ensure all adverse effects on all important ecological and geomorphological values are addressed, i.e. indigenous fish migration and emulating natural flow regimes to allow flushing of weeds and sediments. They are also inconsistent with direction in the NPSFM 2020 to phase-out overallocation. The rule framework for flows and allocation must be amended to ensure further over-</i>	Reclassify as a discretionary activity. Delete the exceptions to take below minimum flow in (a), delete (b) and delete (d).

	Rule WH.R34: Take and use of water in the Whaitua Te Whanganui-a-Tara – discretionary activity.	Amended	Oppose	Freshwater	<i>This rule (and framework) does not give effect to the NPSFM and does not ensure the life-supporting capacity requirements of indigenous species will be met.</i>	Delete Rule WH.R34 so that any takes below minimum flow or in exceedance of an allocation limit defaults to prohibited status.
	Rule WH.R35: Take and use of water from outstanding rivers or lakes – non-complying activity.	Amended	Support	Freshwater	<i>Support in part provided flows and allocation limits are developed to ensure values of outstanding water bodies are protected</i>	Retain
	Rule WH.R36: Take and use of water exceeding minimum flows or core allocation – prohibited activity.	Amended	Support	Freshwater	<i>Ill-defined takes below minimum flow and in exceedance of an allocation limit do not achieve direction in the NPSFM, GW RPS, do not safeguard the life-supporting capacity requirements for indigenous species and must be prohibited.</i>	Amend as follows: The take and use of water from a river (including tributaries) or groundwater in Te Whanganui-a-Tara in Tables 8.8 and 8.9, <del>that does not meet (a) or (b) of Rule WH.R33</del> <b>that is not provided for in Rules WH.33, R155, R156, R159, R160, or P.R30</b> is a prohibited activity.

	Table 8.7: Minimum flows for rivers in the Whaitua Te Whanganui-a-Tara.	Amended	Oppose	Freshwater	<i>The NRP states over-allocation will be considered through the Whaitua Implementation Programme. This plan change is the result of that yet it does not amend the policy direction here. The flow and allocation limits for Whaitua Te Whanganui-a-Tara cannot be said to give effect to the NPSFM 2020 or achieve the purpose of the Act. Interim Interim limits need to be set to ensure life supporting capacity requirements for indigenous species are safeguarded.</i>	Include limits to ensure aquatic ecosystem values are safeguarded.
	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	Oppose	Freshwater	<i>As above</i>	Include limits to ensure aquatic ecosystem values are safeguarded.
	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		
<b>Chapter 9 Te Awarua-o-Porirua Whaitua</b>	<b>9.1 Objectives</b>	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	<p><i>The explanation of the wai ora state is treated as a note and should form part of the objective itself. "Notes" (or "explanatory notes" or "guidance notes") can be argued to have no legal force. It is important that the definition of "wai ora state" has legal effect and is not undermined. Ephemeral watercourses hold ecological values and should be referred to in the chapeau alongside groundwater etc. 2100 is too far away as a target for achieving wai</i></p>	<p>Include reference to <b>ephemeral watercourses</b>.</p> <p>Delete the word "note".</p> <p>Amend the target timeframe to be 2050 (rather than 2100), or to provide part-FMU / catchment specific timeframes that account for the relative ease/difficulty of achieving targets in different catchments.</p> <p>Amend "Rivers flow naturally, with ripples natural riffle, run, and pool habitat and the river beds are stony"</p>
	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	<p><i>Requires amendment to give effect to NPSFM and RMA</i></p>	<p>The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, <b>ephemeral watercourses</b>, and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora, such that by <b>2030</b> <del>2040</del></p> <p>Include reference to natural form and character in the objective (under (a)) and refer to ecosystem health as it is more consistent with NPSFM. i.e., "(a) water quality, habitats, <b>natural form and character</b>... are at a level where the state of <del>aquatic life</del> <b>ecosystem health</b> is meaningfully improved..."</p>
	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	<p><i>Achieves key policy direction in higher order documents, and ultimately, the purpose of the RMA. However shorter timeframe should be set.</i></p>	<p>Retain but amend to set timeframe at 2030.</p>

	Table 9.1: Coastal water objectives.	New	Oppose	Part 1 Schedule 1	<i>Amend to include further parameters and more stringent timeframes</i>	<p>Include a parameter for Turbidity (<b>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: &lt;10.8, Pauatahanui Inlet: &lt;6.9; Open Coast: No discernible change</b>).</p> <p>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.</p> <p>Amend Open Coast unit for Enterococci: <del>&lt;200</del> <b>&lt;40</b></p> <p>Amend timeframe to 2030 or provide interim targets as per NPSFM 3.11 requirement (with this being a critical receiving environment).</p>
	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	Amend	Part 1 Schedule 1	<p><i>NPSFM refers to "threatened species" (Appendix 1A) rather than "threatened freshwater species" ("freshwater species" generally are referred to in Policy 9). Some threatened species that rely on freshwater for part of their lifecycle may not constitute a "freshwater species". Amendment also needed to definition. Providing a standalone objective for habitat ensures implementation of NPSFM policy 7 and 9, and</i></p>	<p>The extent, condition, and connectivity of habitats of nationally threatened <del>freshwater</del> 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.</p> <p>Retain balance of policy to provide direction for protection and monitoring of habitat.</p>
	Objective P.O5: Groundwater flows and levels, and water quality, are maintained.	New	Support	Freshwater	<i>Gives effect to the NPSFM 2020</i>	Retain as proposed
	Objective P.O6: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	New	Amend	Freshwater	<i>Greater provision for natural form and character required to give effect to NPSFM and RMA</i>	Amend "water quality, habitats, <b>natural form and character</b> , and..."

	Table 9.2: Target attribute states for rivers.	New	Amend	Freshwater	<p><i>It is not clear what river types are covered by each part FMU.</i></p> <p><i>Periphyton targets should be no higher than 120 mg to protect ecosystem health.</i></p> <p><i>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.</i></p> <p><i>MCI targets should be higher to protect ecosystem health. The table is missing attributes</i></p>	<p>State river type and class for each of the part FMUs</p> <p>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).</p> <p>Amend nitrate toxicity target to be NPSFM 'A' band for all part FMUs.</p> <p>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 &amp; 6). Minimum DIN target should be no higher than 1.0.</p> <p>Clearly define what fish community health as determined by experts actually means</p> <p>Set higher targets for MCI attributes</p> <p>Retain 'nuisance macrophytes', 'periphyton cover', mahinga kai, and toxicants attributes from table 3.4</p> <p>Retain groundwater attributes from table 3.6</p> <p>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 1.00).</p> <p>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.</p> <p>Set higher targets for e. coli.</p>
	<b>9.2 Policies</b>	New		Both		
	<b>9.2.1 Ecosystem health and water quality</b>	New		Both		
	Policy P.P1: Improvement of aquatic ecosystem health.	New	Amend	Part 1 Schedule 1	<p><i>Explicit provision for natural form and character should be included.</i></p> <p><i>The policy should also include direction that "enhancement" of flows should be through limits and natural means, not 'stream augmentation' or managed aquifer recharge.</i></p>	<p>Amend (b) to read "restoring habitats <b>and natural form and character</b>"</p> <p>Amend (c) to include "by setting limits and reducing allocation volumes in over-allocated catchments, and by restoring natural form and character to promote natural aquifer recharge"</p> <p>Retain balance of policy.</p>

	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	New	Amend	Part 1 Schedule 1	<i>The direction to prohibit unplanned greenfield development is supported but the remaining policy direction in (a) is opposed. This policy effectively supports compensatory measures, by means of financial contributions, for stormwater contamination - an approach that is contrary to RMA s107, the NZCPS, and the effects management hierarchy under the NSPFM. Financial contributions per se are not an "offset". Livestock should be</i>	Amend (a) as follows: "prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants <b>so that adverse effects are avoided</b> and requiring financial contributions as to offset adverse effects from residual stormwater contaminants"  Amend clause (e) so that it refers to ephemeral watercourses, wetlands and estuaries.  Add a clause "(i) land use intensification that individually or cumulatively may lead to a decline in water quality is prohibited"
	Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	New	Support	Freshwater	<i>Ensures NPSFM direction is met.</i>	Retain
	Policy P.P4: Contaminant load reductions.	New	Amend	Part 1 Schedule 1	<i>Interim targets or shorter timeframe is required</i>	Set targets for 2030. If date remains 2040, set out interim states at no longer than 10-year intervals.
	Table 9.3: Harbour arm catchment contaminant load reductions.	New	Amend	Part 1 Schedule 1	<i>Interim targets or shorter timeframe is required</i>	Set targets for 2030. If date remains 2040, set out interim states at no longer than 10-year intervals.
	Table 9.4: Part Freshwater Management Unit sediment load reductions required to achieve the visual clarity target attribute state.	New	Amend	Part 1 Schedule 1	<i>Timeframe is required</i>	Include a timeframe
	<b>8.2.1 Discharges to water</b>	New		Both		
	Policy P.P5: Localised adverse effects of point source discharges.	New	Amend	Part 1 Schedule 1	<i>Policy P.P5 is unduly narrow and repeats matters from RMA s70 which is not expressly limited to point source discharges. Policy P.P5 must be broadened to capture all discharges.</i>	<del>Policy P.P5: Localised adverse effects of point source discharges</del> The localised adverse effects of <del>point source</del> discharges to freshwater and coastal water beyond the zone of reasonable mixing are avoided or minimised, including by avoiding:

	Policy P.P6: Point source discharges.	New	Support	Part 1 Schedule 1	<i>Helps give effect to NPSFM by improving discharge management</i>	Retain
	Policy P.P7 Discharges to groundwater.	New	Support	Freshwater	<i>Helps give effect to NPSFM</i>	Retain and support policy with an objective with target attribute states for groundwater quality, including a target of < 1.0 mg/L nitrate-nitrogen for groundwater to protect human and ecosystem health.
	Policy P.P8 Avoiding discharges of specific products and waste.	New	Amend	Part 1 Schedule 1	<i>The discharges referred to must be broadened to include anything at a concentration that may kill fish.</i>	Add "(e) rubbish (f) agrichemicals, fertilisers, persistent chemicals (g) any other material that may kill fish"
	<b>9.2.2 Stormwater</b>	New		Part 1 Schedule 1		
	Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	New	Amend	Part 1 Schedule 1	<i>Additional toxicants should be referred to to protect ecosystem health. These are already in place in table 3.4 and should be carried through.</i>	Amend to widen reference to include other toxicants, as per the NRP Table 3.4 (ANZG (2018) Default Guideline Values). i.e., "...managed so that the baseline water quality state for <b>toxicants, including</b> copper and zinc, is maintained, or improved where degraded, including in the relevant..."
	Policy P.P10: Managing adverse effects of stormwater discharges.	New	Amend	Part 1 Schedule 1	<i>Stronger direction needed to give effect to NPSFM and protect water quality</i>	Refer to "where possible" instead of "where practicable"
	Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises.	New	Amend	Part 1 Schedule 1	<i>Higher levels of control are required where stormwater is coming from a high risk location</i>	Require resource consent for discharges of stormwater from high risk areas
	Policy P.P12: Managing stormwater network discharges through a Stormwater Management Strategy.	New	Neutral	Part 1 Schedule 1		
	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	New	Amend	Part 1 Schedule 1	<i>Reducing adverse effects to "the extent practicable" enables cost considerations to be factored into decision-makers, which are too often relied upon to side-step taking more environmentally responsible approaches. Reference to "where possible" is required.</i>	The adverse effects of stormwater discharges from new greenfield development shall be minimised, and adverse effects of stormwater discharges from existing urban areas reduced to the extent <b>possible, practicable,</b>  Insert explicit direction referring to and requiring water sensitive design for new and redeveloped areas.

	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	New	Amend	Part 1 Schedule 1	<i>Higher order direction (including both the NZCPS and NPSFM) do not provide for offsetting and compensation as expressed in Policy WH.P15. Further, financial contributions are compensation and not an offset.</i>	Amend to require adverse effects of residual stormwater contaminants to be "avoided, remedied, or mitigated".
	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	New	Support	Part 1 Schedule 1	<i>The policy direction reflects the NZCPS and NPSFM 2020</i>	Retain.
	<b>9.2.3 Wastewater</b>	New		Both		
	Policy P.P16: General wastewater policy to achieve target attribute states and coastal water objectives.	New	Support	Part 1 Schedule 1	<i>The policy direction reflects the NZCPS and NPSFM 2020</i>	Retain.
	Policy P.P17: Progressing works to meet Escherichia coli target attribute states.	New	Amend	Freshwater	<i>Amendment needed to maintain and improve water quality</i>	State "where possible" rather than "where practicable"
	Policy P.P18: Managing wastewater network catchment discharges.	New	Amend	Part 1 Schedule 1	<i>Stronger policy is needed to give effect to NPSFM</i>	Amend (c) to read " <b>eliminate dry weather discharges</b> by progressively reducing the frequency and/or volume of dry weather discharges or the..."
	Policy P.P19: Managing existing wastewater treatment plant discharges.	New	Amend	Part 1 Schedule 1	<i>The policy only seems to comment on maintaining or improving discharge quality where targets are already met.</i>	Amend to include explicit point about reducing e coli loads where target states are currently <u>not met</u> .
	<b>9.2.4 Rural Land Uses and Earthworks</b>	New		Both		
	Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	New	Amend	Freshwater	<i>Ephemeral watercourses and estuaries should also be referred in clause (d) as these can support high ecological values</i>	"(4) excluding stock from water bodies, <b>ephemeral watercourses, and the coastal marine area</b> as a limit on land use,"  Retain balance of policy.

	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	New	Amend	Freshwater	<i>The policy only directs reduction of discharges on large properties and horticultural properties. This risks not capturing discharges that cumulatively are significant. Also, the efficacy of this policy is contingent on an adequate nitrogen risk assessment tool which, per its definition, is proposed to be (unlawfully) delegated to Council to approve. Apart from these aspects, Forest &amp; Bird is generally supportive of the remaining policy direction.</i>	Amend to provide council scope to require reductions in discharges from smaller land parcels. See relief sought for definition of "recognised nitrogen risk assessment tool".
	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	New	Support	Freshwater	<i>Provides a mechanism to reduce sediment loads and therefore protect rivers and receiving environments from the adverse effects of sediment, which is significantly degrading habitat and destroying Te Awarua-o-Porirua</i>	Retain
	Policy P.P23: Phasing of farm environment plans.	New	Amend	Freshwater	<i>Deposited sediment is also a critical measure of sediment movement through thr catchment and of ecological consequences for native species</i>	Amend to include deposited sediment - "prioritises those part Freshwater Management Units where Table 9.2 shows that suspended fine sediment <b>or deposited fine sediment</b> has a baseline state of D and/or where dissolved inorganic nitrogen is shown as being in need of improvement"
	Policy P.P24: Managing rural land use change.	New	Support	Freshwater	<i>Helps give effect to NPSFM</i>	Retain

	Policy P.P25: Promoting stream shading.	New	Amend	Freshwater	<i>The restoration of stream shade can improve water quality and habitat in streams - beyond just assisting with meeting periphyton targets. More active and positive direction on stream shading is also justified.</i>	Contribute to the achievement of aquatic ecosystem health by <del>promoting</del> <b>requiring</b> the progressive shading of streams <del>where nutrient reductions alone will be insufficient to achieve periphyton target attribute states.</del>
	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	New	Amend	Freshwater	<i>Further direction required to ensure effects are minimised</i>	Include direction that large setbacks are required in areas of plantation forestry and include a cap on the area logged in one harvest (or direct selective harvesting where not all trees are taken out). Retain (c) to assist in eventual retirement of high
	Policy P.P27: Management of earthworks sites.	New	Amend	Part 1 Schedule 1	<i>Setback distances from waterways (of 10 metres or more) are an effective method of ensuring fine sediment particles from earthworks are removed and to prevent adverse effects on ecosystems.</i>	Add a new clause: <b>(x) requiring setback distances, of no less than 10 metres, from surface water bodies, ephemeral watercourses, and the coastal marine area.</b>
	Policy P.P28: Discharge standard for earthworks sites.	New	Amend	Part 1 Schedule 1	<i>Controls on deposited sediment are also required</i>	Amend to include (e) "the discharge shall not, after the zone of reasonable mixing, result in: (i) a change in deposited sediment cover of more than 20%, or (ii) an increase in deposited sediment to be more than 20% of the bed"
	Policy P.P29: Winter shut down of earthworks.	New	Amend	Part 1 Schedule 1	<i>Reduces risk of sediment degrading ecosystems</i>	Retain
	<b>9.2.5 Water allocation</b>	Amended/New		Freshwater		
	Policy P.P30: Minimum flows and minimum water levels in Te Awarua-o-Porirua Whaitua.	Amended	Support	Freshwater		
	Policy P.P31: Water takes at minimum flows and minimum water levels.	New	Oppose	Freshwater	<i>Policy P.P31 is contrary to the NPSFM - in particular, to avoid overallocation.</i>	Delete the exceptions to Policy P.P31: The take and use of water from a river, Category A groundwater and Category B groundwater (stream depletion) shall not occur when flows or water levels fall below minimum flows or minimum water levels in Policy P.P30, with the exception that water is available below minimum flows or minimum water levels: a) for firefighting, an individual's reasonable domestic needs and the reasonable needs of a person's animals for drinking water as provided for by section 14(3)(b) and 14(3)(e) of the RMA, or b) as authorised by any existing resource consent.
	Policy P.P32: Allocation in the Te Awarua-o-Porirua Whaitua.	New	Support	Freshwater		
	<b>9.3 Rules</b>	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	<i>Ensures NPSFM direction and water quality outcomes are met</i>	Retain as proposed
	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	Oppose	Part 1 Schedule 1	<i>Rule P.R5 contains elements that need to be subject to more Council oversight. Many elements, such as clause (h), are not sufficiently certain and enforceable for a permitted activity, and leave discretionary assessment to the plan user as to whether the activity is permitted or requires consent. Higher activity status and the addition of clearer and enforceable standards are required to ensure that both compliance with s 70 RMA is achieved and cumulative</i>	Reclassify Rule P.R5 as a controlled activity and include alternative standards that are enforceable and distinguish between discharges that would not have significant adverse effects on aquatic life and those having such effects that then require consent under a higher activity classification. Explicitly require 'water sensitive urban design' as a condition of consent (as per P.R6), including rainwater storage tanks at a property level (which are accessible to provide water for gardening and emergency water supply) and stormwater treatment via wetlands, swales, and rainwater gardens.

	Rule P.R6: Stormwater from new greenfield impervious surfaces – controlled activity.	New	Oppose	Part 1 Schedule 1	<i>Controlled activity status is inappropriate, particularly as the rule has effect in the coastal environment where the NZCPS applies. The inability to refuse consent may not give effect to NZCPS directions and RMA s107(1). Higher activity status is required. Clause c should be deleted as it is inconsistent with the effects management hierarchy.</i>	Reclassify Rule P.R6 as a discretionary activity and delete clause c.
	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas– controlled activity.	New	Amend	Part 1 Schedule 1	<i>Council requires more control to manage effects</i>	Make Restricted Discretionary
	Rule P.R8: Stormwater from a local authority or state highway network–restricted discretionary activity.	New	Oppose	Part 1 Schedule 1	<i>The rule does not allow all effects to be considered.</i>	Reclassify as a discretionary activity rule.
	Rule P.R9: Stormwater from new state highways– discretionary activity.	New	Amend	Part 1 Schedule 1	<i>Clause c does not reflect the effects management hierarchy.</i>	Delete clause c
	Rule P.R10: Stormwater from new and redeveloped impervious surfaces– discretionary activity.	New	Amend	Part 1 Schedule 1	<i>clause (b) does not reflect the effects management hierarchy.</i>	Delete clause (b).
	Rule P.R11: All other stormwater discharges – non-complying activity.	New	Support	Part 1 Schedule 1	<i>Consistent with the RMA's purpose (in conjunction with further and consequential amendments sought by Forest &amp; Bird).</i>	Retain.
	Rule P.R12 – Stormwater discharges from new unplanned greenfield development – prohibited activity.	New	Support	Part 1 Schedule 1	<i>Provides greatest assurance that the RMA's purpose will be met.</i>	Retain.
	<b>9.3.3 Wastewater</b>	New		Part 1 Schedule 1		

	Rule P.R13: Wastewater network catchment discharges to water – restricted discretionary activity.	New	Amend	Part 1 Schedule 1	<i>Discretionary activity status ensures any unforeseen matters can be considered</i>	Reclassify as a discretionary activity.
	Rule P.R14: Existing wastewater discharges from a treatment plant to coastal and freshwater – discretionary activity.	New	Support	Part 1 Schedule 1	<i>Consistent with the RMA's purpose.</i>	Retain.
	Rule P.R15: All other discharges of wastewater – non-complying activity.	New	Support	Part 1 Schedule 1	<i>Consistent with the RMA's purpose.</i>	Retain.
	<b>9.3.4 Land uses</b>	New		Freshwater		
	Rule P.R16: Vegetation clearance on highest erosion risk land– permitted activity.	New	Oppose	Freshwater	<i>The removal of pest plants may still cause sediments to be released and certain pest plants may still be habitat for indigenous species. (e.g., a whole hillside of gorse could be removed, which could then threaten hill stability if no plan is in place for restoration of that hillside). Additional standards are required. Mitigation plans are insufficient on their own and therefore a minimum setback from water bodies, coastal marine</i>	<p>Include additional standards:  <b>(x) the vegetation clearance is not undertaken within, or within 10 metre setback from, a surface water body, ephemeral watercourse, or the coastal marine area</b>  <b>(x) vegetation clearance does not exceed 200m<sup>2</sup> per property in any consecutive 12-month period</b></p> <p>Delete clause (a)(ii). In the alternative, should pest plants be referred to, create a definition of pest plants as those plants listed in the GWRC pest management plan. Introduce a requirement for pest plant removal to not exceed a given area per year- i.e., make it clear the 200m<sup>2</sup> threshold applies at which point you move to P.R17.</p>
	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.	New	Oppose	Freshwater	<i>The inability to refuse consent may mean critical policy direction under the NPSFM or NZCPS will not be achieved, higher activity status is required.</i>	Reclassify Rule P.R17 as a discretionary activity or, alternatively, a restricted discretionary activity and include " <b>adverse effects on the environment</b> " as a matter of discretion.

	Rule P.R18: Vegetation clearance – discretionary activity.	New	Support	Freshwater	<i>Consistent with the RMA's purpose (in conjunction with further and consequential amendments sought by Forest &amp; Bird).</i>	Retain.
	Rule P.R19: Plantation forestry – controlled activity.	New	Amend	Freshwater	<i>The inability to refuse consent may mean critical policy direction under the NPSFM or NZCPS will not be achieved, higher activity status is required.</i>	Reclassify as a discretionary activity.
	Rule P.R20: Plantation forestry – discretionary activity.	New	Support	Freshwater	<i>Ensures management of sediment issues</i>	Retain
	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.	New	Support	Freshwater	<i>Ensures avoidance of sediment issues</i>	Retain
	<b>9.3.5 Earthworks</b>	New		Both		
	Rule P.R22: Earthworks – permitted activity.	New	Oppose	Freshwater	<i>A 5 metre setback is not sufficient to protect ecosystems and maintain water quality. Ephemeral watercourses should also be referred as they have ecological value and, when protected, can reduce contaminant loads.</i>	(d) the earthworks shall not <b>occur within, or within a 10.5 m setback from, of</b> a surface water body, <b>ephemeral watercourse</b> , or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e ) soil or debris from earthworks is not placed where it can enter a surface water body, <b>ephemeral watercourse</b> , or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, <b>ephemeral watercourse</b> , the coastal marine area, or onto land that may enter a surface water body, <b>ephemeral watercourse</b> or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body, <b>ephemeral watercourse</b> , or the coastal marine area, including via a stormwater network.
	Rule P.R23: Earthworks – restricted discretionary activity.	New	Oppose	Part 1 Schedule 1	<i>The listed matters of discretion are not wide enough to ensure all adverse effects on all important ecological values are addressed.</i>	Reclassify as a discretionary activity rule.

	Rule P.R24: Earthworks – non-complying activity.	New	Support	Part 1 Schedule 1	<i>Consistent with the RMA's purpose (in conjunction with further and consequential amendments sought by Forest &amp; Bird).</i>	Retain.
	<b>9.3.6 Nutrients and sediment from pastoral farming</b>	New		Freshwater		
	Rule P.R25: Farming activities on properties of between 4 hectares and 20 hectares – permitted activity.	New	Amend	Freshwater	<i>It is critical that council has information on land use pressures to ensure they can appropriately manage inputs and set limits on resource use, as well as assess effectiveness of the plan. This means information needs to be provided by landowners.</i>	Amend to include " <b>(e2) annual nitrogen fertiliser use, the annual stocking rate, and the winter stocking rate is provided to Wellington Regional Council annually</b> "  Retain balance of rule.
	Rule P.R26: Farming activities on 20 hectares or more of land – permitted activity.	New	Amend	Freshwater	<i>Critical information on farm inputs needs to be required in the rule to ensure council has information on pressures in the catchment</i>	Amend rule to require the reporting of N fertiliser and stocking rate regularly (this is what has been done in PC1 Waikato). Amend the rule to include additional conditions that will ensure drinking water etc is protected, or amend Schedule 36 to ensure those things are covered (see relief sought for schedule 36).
	Table 9.5: Phase in of farm environment plans for Part Freshwater Management Units.	New	Support	Freshwater	<i>Ensures NPSFM outcomes can be met and there is limited delay in implementation</i>	Retain
	Rule P.R27: The use of land for farming activities – discretionary activity.	New	Support	Freshwater	<i>Helps give effect to NPSFM and RMA</i>	Retain
	Rule P.R28: Change of rural land use – discretionary activity.	New	Oppose	Freshwater	<i>A change of land use could lead to increase in contaminants, contrary to the plan policies. This could potentially lead to a decline in water quality, which is over-allocation contrary to NPSFM direction</i>	Reclassify as a non-complying activity.

	Rule P.R29: Farming activities – non-complying activity.	New	Support	Freshwater	<i>Ensures NPSFM outcomes can be met</i>	Retain
	<b>9.3.7 Take and use of water</b>	New		Freshwater		
	Rule P.R30: Take and use of water – permitted activity.	New	Amend	Freshwater	<i>Further parameters required</i>	Add an additional clause: <b>(x) the rate of take from a river does not exceed whichever is the lesser of:</b> <b>a) 10% of the instantaneous flow at the point and time of take, or</b> <b>b) An absolute limit of 2.5 l/s.</b>
	Rule P.R31: Take and use of water – restricted discretionary activity.	New	Oppose	Freshwater	<i>It is inappropriate to assign Restricted Discretionary activity status (or anything other than prohibited) to water takes below a minimum flow or water level. RD status is particularly problematic in light of the Policies, which provide for water to be abstracted for takes authorised by existing resource consents. There is the potential for cumulative effects from multiple takes to cause effects that may not be easily detected through individual</i>	Delete Rule P.R31.
	Rule P.R32: Take and use of water – discretionary activity.	New	Oppose	Freshwater	<i>Flows, levels and taken limits are a mixture of policies and rules when all should be stated as rules. See below.</i>	Delete Rule P.R32 and revise rule framework to enable existing consents to be brought in line with new flows and limits.

	Rule P.R33: Taking and use of water that exceeds minimum flows or allocation amounts – prohibited activity.	New	Oppose	Freshwater	<i>Ill-defined takes below minimum flow and in exceedance of an allocation limit do not achieve direction in the NPSFM, GW RPS, do not safeguard the life-supporting capacity requirements for indigenous species and must be prohibited.</i>	Amend as follows: In any catchment management unit listed in Table 9.6 the take and use of water from a river, Category A groundwater or Category B groundwater, <del>that does not meet conditions (a) or (b) of Rule P.R31</del> <b>that is not provided for in Rules R155, R156, R159, R160, or P.R30</b> is a prohibited activity.
	Table 9.6: Minimum flows for Te Awarua-o-Porirua Whaitua.	New	Oppose	Freshwater	<i>Oppose in part</i>	Ensure limits are adequate to safeguard aquatic ecosystems.
	Table 9.7: Surface water allocation amounts for Te Awarua-o-Porirua Whaitua.	New	Oppose	Freshwater		
					<i>Oppose in part, as it uncertain these limits will ensure aquatic ecosystems and indigenous species are sc</i>	
<b>12 Schedules</b>		Amended/New		Both		
	Schedule A: Outstanding water bodies	New	Amend	Part 1 Schedule 1	<i>Outstanding water bodies need to be listed and mapped.</i>	List and map outstanding water bodies in the area that are streams/rivers/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	<i>Further detail is required to ensure values can be protected</i>	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	Neutral	Part 1 Schedule 1	<i>Additional detail coming from DOC report on habitat requirements of native fish</i>	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		Retain
	Schedule F2a: Significant habitats for indigenous birds in rivers.	Amended	Support	Part 1 Schedule 1		Retain
	Schedule F2b: Significant habitats for indigenous birds in lakes.	Amended	Support	Part 1 Schedule 1		Retain
	Schedule F2c: Significant habitats for indigenous birds in the coastal marine area.	Amended	Support	Part 1 Schedule 1		Retain
	Schedule F4: Sites with significant indigenous biodiversity values in the coastal marine area.	Amended	Support	Part 1 Schedule 1		Retain
	Schedule F5: Habitats with significant indigenous biodiversity values in the coastal marine area.	Amended	Support	Part 1 Schedule 1		Retain
	Schedule 27: Freshwater Action Plan requirements.	New	Support	Part 1 Schedule 1	<i>Meets NPSFM requirements</i>	Retain
	A Freshwater Action Plans	New	Support	Freshwater	<i>Meets NPSFM requirements</i>	Retain
	A1 Purpose	New	Support	Freshwater	<i>Meets NPSFM requirements</i>	Retain

	A2 Freshwater Action Plans required in Whaitua Te Whanganui-a-Tara.	New	Amend	Freshwater	<p><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></p>	<p>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 Rangituhi          Wai-O-Hata</p>
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	A3 Freshwater Action Plans required in Te Awarua-o-Porirua Whaitua.	New	Select stance	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 Rangituhi Wai-O-Hata
	B Freshwater Action Plan requirements.	New	Support	Freshwater	<i>Meets NPSFM requirements</i>	Retain
	B1. Principles.	New	Select stance	Freshwater	<i>Meets NPSFM requirements</i>	Retain
	B2. General Content.	New	Select stance	Freshwater	<i>Meets NPSFM requirements</i>	Retain
	B3 Necessary actions.	New	Select stance	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	Select stance	Freshwater	<i>Meets NPSFM requirements</i>	Retain
	D Freshwater Action Plans in Te Awarua-o-Porirua Whaitua	New	Select stance	Freshwater	<i>Meets NPSFM requirements</i>	Retain
	Schedule 28: Stormwater Contaminant Treatment.	New	Support	Part 1 Schedule 1	<i>Supports achievement of ecosystem health</i>	

	Table 1: Target load Reductions for Copper and Zinc	New	Support	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	Oppose	Part 1 Schedule 1	Inconsistent with NPSFM	Delete
	Tale D2. Financial contribution calculations for non-residential greenfield development and new roads/state highways	New	Oppose	Part 1 Schedule 1	Inconsistent with NPSFM	Delete
	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>Ensures NPSFM can be effected and sediment can be managed</i>	
	A Purposes of the Erosion and Sediment Management Plan	New	Support	Freshwater	<i>Ensures NPSFM can be effected and sediment can be managed</i>	
	B Management objectives	New	Support	Freshwater	<i>Ensures NPSFM can be effected and sediment can be managed</i>	

	C Requirements of the Erosion and Sediment Management Plan	New	Support	Freshwater	<i>Ensures NPSFM can be effected and sediment can be managed</i>	
	C1 Contents of the Erosion and Sediment Management Plan	New	Support	Freshwater	<i>Ensures NPSFM can be effected and sediment can be managed</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>Ensures NPSFM can be effected and sediment can be managed</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	Neutral	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>	<p>Include requirement to report nitrogen fertiliser use.</p> <p>Retain balance of schedule.</p>

	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Amend	Freshwater	<i>Amendments needed to ensure effects are managed</i>	
	A Certification requirements under the Resource Management (Freshwater Farm Plans) Regulations 2023.	New	Select stance	Freshwater		
	B Management objectives.	New	Amend	Freshwater	<i>Amendments needed to ensure effects are managed</i>	Management objective B should define 'revegetation' so that it means 'woody vegetation' or 'indigenous woody vegetation'. Otherwise it could be interpreted to mean grass, or weeds, etc. Management objective B should define 'not reasonably practicable' by setting out the circumstances or considerations that would make revegetation 'not reasonably practicable' or else it is up to a case-by-case assessment and could include considerations of cost or other goals of the farmer. If the 'not reasonably practicable' exemption is used, the certifier should assess the soil erosion control measures using an accepted methodology (not just estimating it). Management objective B should include not increasing nitrogen loss risk above the baselines in C(1) in order to maintain water quality and achieve policies of plan.
	C Content of a farm environment plan.	New	Amend	Freshwater	<i>Councils need to collect information on inputs as pressures in catchments</i>	Include requirements of annual reporting of stocking rates and fertiliser use
	D Risk assessment and mitigation to address risk.	New	Neutral	Freshwater		
	Table D1 Sediment loss and transport risk factors	New	Neutral	Freshwater		
	E Erosion Risk Treatment Plan.	New	Amend	Freshwater		E erosion risk plan needs to have clear enforceable goals, and the provisions for critical source areas need to apply across the farm – not just on high erosion risk land.
	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 Additional requirements needed to ensure effects are managed</i>	Amend to outline setback distance as a requirement, and to require revegetation of margins (with council support)  F small steam riparian programme needs to have clear enforceable goals; clear criteria for how to assess risk of erosion, deposition and damage to the stream bed (a stocking rate threshold may be a good alternative); and clear criteria for when fencing is required, when it is not practicable, and how alternative measures to fencing to minimise stock access to water will be assessed. As proposed, we are concerned they do not implement policies (e.g., WH.P26).
<b>13 Maps</b>		New		Both		
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4).	New	Support	Part 1 Schedule 1	<i>Maps assist with plan interpretation.</i>	Retain
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 1: (Kāpiti).	New	Support	Part 1 Schedule 1	<i>Maps assist with plan interpretation.</i>	Retain

	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 2: (Wellington Harbour).	New	Support	Part 1 Schedule 1	Maps assist with plan interpretation.	Retain
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 2: Te Awarua-o-Porirua.	New	Support	Part 1 Schedule 1	Maps assist with plan interpretation.	Retain
	Map 77: Habitats of nationally threatened freshwater species – Te Awarua-o-Porirua and Te Whanganui-a-Tara (Schedule F1).	New	Support	Part 1 Schedule 1	Maps assist with plan interpretation.	Retain
	Map 78: Part freshwater management units and target attribute state sites (rivers) – Te Awarua-o-Porirua.	New	Support	Freshwater	Maps assist with plan interpretation.	Retain
	Map 79: Part freshwater management units and target attribute state sites (rivers) – Te Whanganui-a-Tara.	New	Support	Freshwater	Maps assist with plan interpretation.	Retain
	Map 80: Part freshwater management units and target attribute state sites (lakes) – Te Whanganui-a-Tara.	New	Support	Freshwater	Maps assist with plan interpretation.	Retain
	Map 81: Rivers and catchment management units for water takes – Te Awarua-o-Porirua.	New	Support	Freshwater	Maps assist with plan interpretation.	Retain
	Map 82: Coastal water management units – Te Awarua-o-Porirua.	New	Support	Part 1 Schedule 1	Maps assist with plan interpretation.	Retain
	Map 83: Coastal water management units – Te Whanganui-a-Tara.	New	Support	Part 1 Schedule 1	Maps assist with plan interpretation.	Retain
	Map 84: Harbour arm catchments – Te Awarua-o-Porirua.	New	Support	Part 1 Schedule 1	Maps assist with plan interpretation.	Retain
	Map 85: Primary contact sites – Te Whanganui-a-Tara.	New	Support	Freshwater	Maps assist with plan interpretation.	Retain
	Map 86: Unplanned greenfield areas – Porirua City Council.	New	Support	Part 1 Schedule 1	Maps assist with plan interpretation.	Retain
	Map 87: Unplanned greenfield areas – Wellington City Council.	New	Support	Part 1 Schedule 1	Maps assist with plan interpretation.	Retain
	Map 88: Unplanned greenfield areas – Upper Hutt City Council.	New	Support	Part 1 Schedule 1	Maps assist with plan interpretation.	Retain
	Map 89: Unplanned greenfield areas – Hutt City Council.	New	Support	Part 1 Schedule 1	Maps assist with plan interpretation.	Retain
	Map 90: Highest and high erosion risk land (Pasture) – Te Awarua-o-Porirua.	New	Support	Freshwater	Maps assist with plan interpretation.	Retain
	Map 91: Highest erosion risk land (Woody vegetation) – Te Awarua-o-Porirua.	New	Support	Freshwater	Maps assist with plan interpretation.	Retain

	Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua.	New	Support	Freshwater	<i>Maps assist with plan interpretation.</i>	Retain
	Map 93: Highest and high erosion risk land (Pasture) – Te Whanganui-a-Tara.	New	Support	Freshwater	<i>Maps assist with plan interpretation.</i>	Retain
	Map 94: Highest erosion risk land (Woody vegetation clearance) – Te Whanganui-a-Tara.	New	Support	Freshwater	<i>Maps assist with plan interpretation.</i>	Retain
	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.	New	Support	Freshwater	<i>Maps assist with plan interpretation.</i>	Retain
	Map 96: Mākara catchment.	New	Support	Freshwater	<i>Maps assist with plan interpretation.</i>	Retain
	Map 97: Mangaroa catchment.	New	Support	Freshwater	<i>Maps assist with plan interpretation.</i>	Retain